

October 19, 2021

Canadian Nuclear Safety Commission
c/o Louise Levert, Secretariat
280 Slater St. PO Box 1046
Ottawa, Ontario K1P 5S9

Re: Canadian Nuclear Association Intervention Regarding Cameco Corporation's licence renewal application for the Blind River Refinery

The Canadian Nuclear Association (CNA) has approximately 100 members, representing over 70,000 Canadians employed directly or indirectly in exploring and mining uranium, generating electricity, advancing nuclear medicine and promoting Canada's worldwide leadership in science and technology innovation. Our members are committed to safety throughout the entire life cycle of the nuclear industry and as such are supportive of Cameco Corporation's request for a 10-year renewal of its licence for the Blind River Refinery (BRR).

Nuclear energy is a safe, reliable, and non-emitting source of energy that not only helps Canada and indeed the world meet its electricity needs but is also a critical element in the world's fight against climate change. It is widely acknowledged that nuclear energy must play a greater role if the world is to meet its climate change goals. Canada is the world's second largest producer of uranium and the BRR is an essential part of the world's supply of uranium.

Cameco is one of the world's largest producers of uranium and the BRR is the world's largest commercial uranium refinery and has been safely processing natural uranium ore concentrates into natural uranium trioxide (UO₃) since 1983. The majority of the UO₃ is shipped to Cameco's Port Hope conversion facility where it is converted to uranium dioxide (UO₂) or uranium hexafluoride (UF₆). Some small quantities are currently shipped to other licensed customers around the world.

Consistent with its vision and values, Cameco's BRR emphasizes the health and safety of its workers, the public and protecting the environment. As with all its facilities, Cameco continually strives to improve safety performance and processes.



In the current licence period, BRR has enhanced its effective site programs to align with new or updated CSA standards and new REGDOCs resulting in the CNSC rating BRR's performance as at least satisfactory in all Safety and Control Areas for each year of the existing licence.

Cameco is extremely proud of its safety performance and in June 2021 celebrated 15 years without a lost-time accident. This is a tribute to Cameco's strong safety culture, well established worker protection program and its comprehensive training program for all employees.

These programs are supported by formal hazard recognition, risk assessment, change control processes and an established preventative maintenance program. In addition, there is a strong internal audit program, multiple inspection programs, incident investigations and ongoing analysis by the BRR Health and Safety Committee.

Cameco places a strong focus on its environmental performance and is also proud of the fact that it has not had an environmental incident during the current licence period. BRR is compliant with ISO 14001 (2015) Environment Management Systems and the facility conducts extensive sampling of water and air emissions, including high-volume sampling of ambient air both near the refinery and in the Town of Blind River. Monitoring results demonstrate that BRR did not exceed any environmental action levels and was well below the limits set by regulatory bodies.

As with all its facilities, Cameco maintains an open and transparent public information program to ensure key groups and individuals with an interest in BRR operations are informed on a timely basis about operations, activities and potential effects on the environment and the health and safety of persons. Cameco employs the following best practices to ensure the best possible public engagement: multiple, open channels (including website, social media, videos, printed materials); the use of fact-based, uncomplicated and clear communication and adaptive communications so the best vehicle is used for different audiences and specific topics of interest are addressed.

BRR has maintained strong community support since public opinion research began in 2009. The most recent survey (2021) indicated that 96% of Blind River residents are supportive of Cameco's operations and there is 100% awareness of the facility. 94% of residents agree that Blind River is a safe, healthy place to live including 77% who "strongly agree".



Cameco takes great pride in its long-standing relationships with Indigenous communities and is committed to maintaining those relationships. Cameco established an MOU with the Mississauga First Nation in 2010 that solidified and documented an effective relationship built over many years. Cameco provides its Quarterly Compliance Monitoring and Operational Performance Report and Annual Compliance Report to the Mississauga First Nation and the Serpent River First Nation.

The CNA believes that past performance is the best indicator of future performance. CNA believes that Cameco's proven track record of safe, environmentally responsible operations combined with its commitment to continuous improvement demonstrates that Cameco is a trustworthy and reliable operator, and the CNA is pleased to strongly recommend that the CNSC renew Cameco's Licence for its Blind River Refinery for the requested 10-year period.

Please feel free to contact Steve Coupland at couplands@cna.ca or 519-386-0704 © should you have questions or require additional information.

Sincerely,



John Gorman
President and CEO
Canadian Nuclear Association

