



**CAMECO CORPORATION**

Corporate Office  
2121 - 11th Street West  
Saskatoon, Saskatchewan  
Canada S7M 1J3

Tel 306.956.6200  
Fax 306.956.6201  
www.cameco.com

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Canadian Nuclear Safety Commission  
P.O Box 1046, Station B  
280 Slater Street  
Ottawa, ON, Canada  
K1P 5S9

Dir Tel 306-956-6485  
Dir Fax 306-956-6590

Dear Sir or Madam,

**Re: Comment on Draft Regulatory Document RD/GD-338 Security Measures for Sealed Sources**

Cameco Corporation (Cameco) appreciates the opportunity to comment on RD/GD-338 Security Measures for Sealed Sources. Cameco has operations within Canada that mine and mill uranium, refine uranium, convert uranium into fuel for Candu and other reactors and manufacture fuel bundles for Candu reactors. At these facilities we store and use a number of relatively low risk sources.

One general comment we would like to make is that the detail and rigor of the requirements for securing high risk sources seems generally reasonable, however, for operations such as ours who possess only category 4 and 5 sources it is not entirely clear in all cases what the expectations are. It is stated that for Category 4 and 5 sources this document represents prudent management practices, however, this wording leaves open the possibility of misinterpretation; specifically, the misinterpretation that the full rigor of the requirements of the high-risk sources would be appropriate for low-risk sources. It is recommended that the application of this document be further clarified to indicate, for example, that with a lower risk the rigor of application of these practices should also be reduced. Table 1 contains our specific comments and recommendations related to this document.

Table 1: Comments and Recommendations for RD/GD-338

Section	Comment	Recommendation
2.1	The term “in close proximity” is not entirely clear.	In a uranium milling facility, there are several separate ‘processes’ that are occurring on the same site that may involve the use of nuclear density gauges. In this respect, it is assumed that “in close proximity” means associated with a specific aspect of the process; further is it assumed that this does not apply to all sources collectively on a site (i.e. the entire mill is considered a “process”). It is recommended that the term “in close proximity” be clarified, e.g. use the term “separate manufacturing processes” or a statement indicating that an entire site is not considered a single use or storage location.
2.2	Though source categories 4 and 5 are mentioned, the threshold between these categories is never specified	If sources are supposed to be classified as Category 4 or 5, the specifications/thresholds for these categories should be defined.
2.2.2	The example used for multiple sealed source storage is not worded well. It describes “sealed sources at a single licensed location”. It does not make sense that “in close proximity” would mean the entirety of a licensed location.	Again, the term “in close proximity” should be clarified and a more clearly worded example given, for example using the term “in a single storage area” rather than “single licensed location”.
Table B	Based on the descriptions within the categories, it appears that these requirements apply to storage and transport, but not use of the sources, i.e. it is not possible to put a source that is in use inside of a secure container.	It is recommended that if it is the case that these requirements apply to storage and transport only that this be clarified in the title of the table or in the reference to the table in section 3.1.2. This may also be defined in Section 2.1 as well.
3.1.2	The requirement for a threat and risk assessment does not specify if it require for all categories of sources or if the degree of rigor in the assessment is to be commensurate with the risk of the sources. Further, Cameco already has a standard for performing risk assessments and it seems reasonable that this risk assessment could be incorporated into our existing systems.	It is recommended that this section clarify if this applies to all source categories. Clarification is also requested regarding whether this risk assessment can be incorporated into existing assessments.
3.2	It is not stated explicitly that the technical security measures described in the associated subsections of Section 3.2 only apply as indicated by Table B.	It is recommended that Section 3.2 contain some preliminary text indicating that the security measures described in the associated subsections apply as described in Table B and

	Further, the associated subsections are worded such that it appears that all aspects discussed are required.	that the security measures described do not apply to all source categories. Further, for clarification, it is recommended to state or clarify in each subsection that only those aspects associated with the specific source category of interest are required or applicable.
3.2	It is stated in Section 3.1.1 that general security measures apply to sources while in storage. Section 3.2 does not contain this clarification.	It is recommended that Section 3.2 contain a statement to clarify when these measures apply, i.e. while a source is in storage.
3.2.5.1.1	The definition of a secure container is very narrow and does not permit a comparable (or higher) level of security using a different configuration or method.	At a mining, milling or uranium processing facility, it is often the standard practice to store sources inside of a secure room with a locked door, which would seem to be comparable to or better than a wire mesh cage. It is recommended that section 3.2.5.1.1 be reworded to be somewhat more general and allow for comparable means of securing these sources.
3.2.5.2.1	The guidance for a secure container e.g. be resistant to an attack by a sledgehammer or drill, does not seem commensurate with the type of containers specified in section 3.2.5.1.1, e.g. file cabinets. Further, this guidance seems more in line with requirements necessary for category 1, 2, and 3 sources rather than category 4 and 5.	It is recommended that these requirements be verified to ensure they are appropriate.
3.2.6.1	This section contains a requirement to notify the local police force and make arrangements with offsite emergency responders. Many of our facilities are located in very remote areas that have no local police or emergency responders. This requirement is understandable in urban settings but not universally applicable	It is recommended the wording be modified to include the term "as applicable" in reference to local responders.
3.3	It is not clear if this section applies to only sources that are in storage or includes sources that are in use.	All other aspects of this procedure have been related to storage or transport of the sources. Section 3.1 specifically states that security measures apply to source storage. Section 3.2 appears to discuss requirements in relation to source storage locations as well. It is recommended that section 3.3 explicitly state that these requirements apply only to the source storage locations or if sources in use

		are included
3.3.3	The use of sources, particularly nuclear density gauges, is already restricted to only those who have appropriate training courses. It appears to state that a separate training program is required, however, it seems reasonable to have the option to incorporate these requirements into pre-existing training if this is appropriate.	It is recommended that the option be available to incorporate the Security Awareness Program aspects into other existing training as applicable.

Thank you for consideration of our comments.

Regards,



Kari Toews, M.Sc.  
Program Manager, Occupational Safety  
Cameco Corporation