



VIA EMAIL

June 16, 2015

Mr. Brian Torrie  
Director General  
Regulations Policy Directorate  
Canadian Nuclear Safety Commission  
PO Box 1046, Stn B  
280 Slater Street  
Ottawa ON K1P 5S9

Dear Mr. Torrie:

**Re: AREVA Resources Canada Inc. (AREVA) Comments on the Canadian Nuclear Safety Commission (CNSC) Discussion Paper DIS-15-01, *Proposal to Amend the Nuclear Non-Proliferation Import and Export Control Regulations***

AREVA is writing to provide comments on Discussion Paper DIS-15-01, *Proposal to Amend the Nuclear Non-proliferation Import and Export Control Regulations (NNIECR)*. In general AREVA does not have any major concerns with regards to importing or exporting requirements however, reducing administrative burden where possible without compromising CNSC's obligation for international safeguard is strongly supported by AREVA to increase efficiencies and reduce unnecessary costs. As discussed in our comments on DIS-14-02 *Modernizing the CNSC's Regulations* submitted on May 29, 2015, AREVA suggested that the CNSC could reduce administrative burden when issuing import and export licences by extending licence terms and granting multi-destination export licences with the end user customer for each of the customer's destinations. Although, the bulk of the proposed amendments to NNIECR in DIS-15-01 are to the Nuclear Suppliers Group (NSG) control lists approved in June 2013 by NSG Participating Governments, including Canada, AREVA would like to offer the following comments on the additional proposed amendments in the discussion paper:

First, in section 2.3 of the Discussion Paper, the CNSC proposes a requirement for an applicant to include their written compliance procedures in an application for a licence to import or export:

*"the applicant's written procedures to ensure compliance with import and export regulatory requirements, including those associated with the allocation of management functions and responsibilities, internal tracking and compliance verification procedures, internal audit*

*procedures, staff training programs and record management procedures that will be required to be submitted with the first application for a licence to import or export”.*

AREVA would like the CNSC to provide clarification on the required scope and details that would be expected in a compliance procedure as this is unclear as currently written. AREVA does agree with the CNSC that this should be a one-time requirement and that licensees will only need to make reference to it with subsequent licence applications. In addition, AREVA would be pleased to provide the CNSC with any early feedback during the review process of RD-336 and GD-336 *Accounting and Reporting of Nuclear Material (2010)* to create REGDOC 2.13.1, *Safeguards and Nuclear material Accountancy* as outlined in the CNSC’s Regulatory Framework Plan.

Lastly, AREVA has no concerns with the proposed amendment in section 2.4 of the Discussion Paper, entitled *Proposed record retention requirement*, where the CNSC proposes to add a requirement which would specify a six year record retention period versus the *General Nuclear Safety and Control Regulations’* default of one year. AREVA is also in support of the CNSC’s proposal to remove the requirement to present an import or export licence to a Customs officer for prescribed information described in section 2.5, *Proposed amendment to the General Nuclear Safety and Control Regulations*.

We would be pleased to respond to any questions regarding this submission. Please contact the undersigned at [tammy.vanlambalgen@areva.ca](mailto:tammy.vanlambalgen@areva.ca) or (306) 343-4569.

Sincerely,

A handwritten signature in blue ink that reads 'Lambalgen'.

Tammy Van Lambalgen  
Vice President, Regulatory, CSR & Legal

cc: J.Leclair, UMMD-CNSC