



VIA EMAIL

June 10, 2016

Mr. Brian Torrie  
Director General  
Regulation Policy Directorate  
Canadian Nuclear Safety Commission  
280 Slater Street  
Ottawa ON K1P 5S9

Dear Mr. Torrie:

**Re: Comments on the Canadian Nuclear Safety Commission (CNSC) Discussion Paper DIS-16-01 *How the CNSC Considers Information on Costs and Benefits: Opportunities to Improve Guidance and Clarity***

AREVA Resources Canada Inc. (AREVA) appreciates the opportunity to provide comments on DIS-16-01: *How the CNSC Considers Information on Costs and Benefits: Opportunities to Improve Guidance and Clarity*. AREVA supports additional clarity and context provided that two main principles of the existing regulatory policy, consistent with the *Nuclear Safety and Control Act* (NSCA) and regulations, are preserved. They are:

- provision of information on the costs and benefits remain proponent driven, and
- the CNSC is able to consider cost and benefit information when making regulatory decisions.

The following are AREVA's responses to the questions outlined in the discussion paper.

**Question 1: Should any elements be added or removed from the draft guidance?**

AREVA is satisfied with the guidance for proponents as it maintains flexibility.

**Question 2: Are there other resources the CNSC should include in the draft guidance?**

No other resources are identified at this time.

**Question 3: Is there a need for further discussion on methodologies or certain aspects of estimating costs in use by the Canadian nuclear sector?**

AREVA feels that there is no further discussion needed on methodologies for estimating costs in use by the Canadian nuclear sector. There is no shortage of available guidance on methodologies for cost-

benefit analysis. The CNSC could further elaborate and clarify its position regarding the similarities and differences between the principles of ALARA and BATEA.

**Question 4: Are there alternative ways of obtaining information on costs and benefits?**

AREVA prefers that the methods used to obtain costs-benefits information remain flexible and proponent driven. AREVA does not consider that it is CNSC's mandate to obtain costs and benefits information for proponents, other than to garner information to fulfill its Regulatory Impact Analysis Statement (RIAS) responsibilities.

**Question 5: Should the CNSC identify specific program areas in which the submission of a formal costs-benefit analysis by the applicant should be considered?**

No. As stated in Section 2.3, "The NSCA and its regulations do not explicitly require submission of cost-benefit information to the CNSC". It is the decision of the proponent to provide costs-benefit analysis; specific program areas should not be mandated by the CNSC. The level and detail of the analysis should be risk-based. Further, assessing alternative means during an environmental assessment under the *Canadian Environmental Assessment Act, 2012* is rigorously evaluated in that process and therefore, duplication of efforts should be avoided. Generally, licensee submissions demonstrate how health, safety, security and environmental objectives are met. It should be clarified that cost-benefit analyses are not required but driven by the proponent to support regulatory decision making when needed.

**Question 6: Did we miss anything?**

It would be valuable to include details on how the CNSC uses cost-benefit information during the creation of requirements in Regulatory Documents.

AREVA would be pleased to discuss our comments further. If you have any questions, 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, Corporate Affairs & General Counsel