



April 13, 2017

VIA email only

cnscc.consultation.ccsn@canada.ca

Canadian Nuclear Safety Commission

P.O. Box 1046, Station B

280 Slater Street

Ottawa, ON, Canada K1P 5S9

To whom it may concern:

Re: REGDOC-2.13.1 Safeguards and Nuclear Material Accountancy - Comments

Thank you for the opportunity to comment on the proposed regulatory document. We understand that REDDOC-2.13.1 will supersede:

- RD-336, Accounting and Reporting of Nuclear Material
- GD-336, Guidance for Accounting and Reporting of Nuclear Material

I have reviewed the new REGDOC and have the following comments:

Sections 2.1 Group 1 material and 2.2 Group 2 material – Ore Concentrates

The reference to ASTM-C753-04 *Standard Specification for Nuclear-Grade, Sinterable Uranium Dioxide Power* is outdated. This standard is superseded by ASTM-C753-16a.

Section 6.3 Complementary Access

The notification period of 2 to 24 hours for a request for complimentary access for the IAEA may not be practical for remote uranium mining and milling operations in Northern Saskatchewan. Access to the site is either by charter aircraft (2 hours flying time) from Saskatoon into a remote airport or by driving for 12 hours from Saskatoon.

REGDOC 2.13.1 Safeguards and Nuclear Material Accountancy Comments letter.docx
April 13, 2017
Curt ANDREWS (AREVA Resources Canada)

AREVA Resources Canada Inc.

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P.O. Box 9204 — 817 - 45th Street West — Saskatoon, SK S7K 3X5 — CANADA
Tel: 1 (306) 343-4500 — Fax: 1 (306) 653-3883 — Web Site: www.avevaresources.ca

Section 8.1.2 Inventory change document - correcting or deleting an inventory change document

When we started to use RD-336 and GD-336 it was not always clear as to what constituted a correction or a change to an Inventory Change Document (ICD). Is it possible to provide some examples as to what is considered a correction or change and what is not? For example, is a change to spelling in the remarks box (1004) considered a correction?

Appendix D Table D2: Labels and data elements used in nuclear material accountability reports

On the Inventory Change Document (ICD) there is a box for **Licensee Reference No.**, does this field have any restrictions on the format of the number?

The MBA codes and country codes were previously included with RD-336 / GD-336. The new REGDOC now points to the CNSC website. It is currently difficult to find the MBA codes on the CNSC website. The links in the REGDOC only point to the main CNSC website and not to the table of codes.

Should you have any questions, please contact me at (306) 343-4517 or via email curt.andrews@areva.com

Sincerely yours,



Curtis J. Andrews, B.Sc., P.Eng., P. Geo.

Manager, Uranium Contract, Transport and Special Projects