



**CAMECO CORPORATION**

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

Tel 306.956.6200

Fax 306.956.6201

[www.cameco.com](http://www.cameco.com)

April 29, 2014

VIA EMAIL

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

**Dear Mr. Torrie**

**Cameco Comments on REGDOC-2.13.2, *Safeguards and Non-proliferation: Import and Export***

Cameco Corporation (Cameco) has prepared the following comments on REGDOC-2.13.2, *Safeguards and Non-proliferation: Import and Export* (“the Document”). Generally, the guidance and information contained in the Document will be helpful to licensees that undertake imports and exports of nuclear goods and information. However, there are a few sections of the Document that Cameco believe could be further clarified. Cameco’s recommendations for further clarifications to enhance the usefulness of the Document are set out below.

**Section 6.2 - Intangible Technology Transfers**

The utility of the Document would be enhanced by a discussion in section 6.2 of the process to be followed by the licensee in respect of intangible technology transfers to comply with section 18 of the *General Nuclear Safety and Control Regulations* (GNSCR), which requires the licensee to present the required import or export licence to a customs officer upon the import or export of a nuclear substance, prescribed equipment or prescribed information.

**Section 8.1 – Audits of Licence Conditions**

Section 8.1 refers to audits of licence conditions and notes common conditions included in licences relate to the action to be taken with respect to the Canadian Border Services Agency (CBSA) in relation to s. 18 of the GNSCR. It would be helpful for the Document to include a discussion of whether these conditions apply to both physical and intangible transfers, and to provide examples of these types of licence conditions.

**Appendix A – End-Use Statements**

Appendix A provides examples of possible suspicious inquiries or orders, including if a customer is reluctant to provide information about the end-use of the item or refuses to provide an end-use statement. An end-use statement is not defined or referred to elsewhere in the Document. Cameco suggests the CNSC define an end-use statement in the Document, and clarify the circumstance in which an end-use statement is required.

Cameco would be pleased to respond to any further questions. Please contact the undersigned at (306) 956-6685 or [liam\\_mooney@cameco.com](mailto:liam_mooney@cameco.com).

Sincerely,



R. Liam Mooney  
Vice-President  
Safety, Health, Environment, Quality & Regulatory Relations  
Cameco Corporation

LH:lp

c: L. Chamney - CNSC  
Regulatory Records - Cameco