



**Written submission from
Val Drummond and
Rodney Gardiner**

**Mémoire de
Val Drummond et
Rodney Gardiner**

In the Matter of

À l'égard de

Cluff Lake Project

Établissement de Cluff Lake

Request by Areva Resources Canada to accept the reduction of the Cluff Lake Project Financial Guarantee and Amend the Decommissioning Licence with the company's new name Orano Canada Inc.

Demande d'Areva Resources Canada pour accepter la réduction de la garantie financière du projet Cluff Lake et modifier le permis de déclassement avec le nouveau nom de l'entreprise, Orano Canada Inc.

Public Hearing - Hearing in writing based on written submissions

Audience Publique - Audience fondée sur des mémoires

June 2018

Juin 2018

Our intervention takes the form of a “Letter to the Editor” which, in various forms is being submitted to print and social media outlets. We attach this for your information.

We know that the Orano requests will receive the usual rubber stamp from the CNSC. But we want to be on the record as opposing (1) this form of “decommissioning”, which you have facilitated and (2) the further dumping of liability on the province planned for 2019.

Val Drummond and Rodney Gardiner
Saskatchewan

Dear Editor:

There was a time in Saskatchewan when we believed that it was okay for uranium mining companies to walk away from mine sites like Gunnar mine (1955-63) near Uranium City, leaving the tailings behind on the surface and spilling out into the environment. When the company finished mining, they simply walked away and left everything as it was. At that time, we seemed to have no real understanding of the need or cost of clean-up, which has only recently been undertaken by the federal and provincial governments. A recent estimate put the cost of clean-up at Gunnar mine at a quarter billion Canadian dollars.

\$102 million has already been spent, thanks to our tax dollars. Of that amount, the Federal government is only willing to cover \$12.3 million.

In 2019 Saskatchewan is about to make the same mistake again, only this time companies must undertake works aimed at “decommissioning” the site before they leave. But will this work protect us for the thousands of years into the future while these radioactive pollutants remain active and dangerous?

The first such uranium mine to decommission its site is the AREVA site at Cluff Lake. On the surface, things look quite “cleaned up”, (much is simply buried in the tailings area), but we have reason to be concerned when dealing with radium 226, thorium, polonium 210, molybdenum, selenium, arsenic, cadmium, Lead 210 and more, which are left in the tailings area along with nearby huge foothills of “waste” rock containing many pollutants of concern. Because none of this radioactivity is detectable by the human senses of sight, smell or touch, it is very easy to cover up. Tailings from the high-grade ore at Cluff Lake are not abandoned on the surface, granted, but they are at most one meter below the surface.

The Cluff Lake tailings area, which is 192.564 hectares (474 acres) in size, is simply a low area surrounded by small hills on three sides and a lake on the fourth side. Between the lake and the tailings area is a “dam”. No work was done to prepare the low area to receive these radioactive tailings – no barrier of any kind. Tailings were dropped in this low area, and then as part of the decommissioning work, a meter of glacial till was placed over top. The person who placed this till describes having to work in the winter because the tailings area was like muskeg and had to be frozen for his equipment to operate there. He knows that in some areas there is not even a meter of protection between the tailings and the surface. He now sees water surfacing in these areas and the tracks of moose walking through (and no doubt drinking) these waters. (See photo.) But the company and the government seem unwilling to even consider adding more till.

After only 14 years of earthworks, site monitoring and planting trees and grasses, AREVA feels that it has shown their decommissioning to be ‘successful’. Over such a short period of time they may well be able to come up with numbers showing the release of radioactive pollutants to the environment as slow-moving and relatively localized....so far! They have time on their side. They intend to turn the site over to our province in 2019 with no actual containment system in place, and we will be the ones to see what happens over the next hundreds to thousands of years. As with Gunnar, we are the ones who will pay the price. But surely we demand some funding be put aside for a guarantee into the future? Originally the Saskatchewan Government accepted a guarantee of \$33.6 million from AREVA, which seems remarkably low. This amount, according to the CNSC (Canadian Nuclear Safety Commission), must be able to cover:

- any post-decommissioning monitoring or institutional control measures that may be required
- subsequent long-term management or disposal of all wastes

But in 2015, the Saskatchewan Government expressed some willingness to accept a lower amount - \$26.8 million.

Quite honestly, here we go again. Years down the road, as we try to contain the spread of radioactive pollutants (at a huge cost to provincial taxpayers), we will shake our heads and wonder how we could have let this happen again.

On June 5, 2018, at a closed-door CNSC hearing, it will be decided whether or not the reduced amount of money is acceptable (assuming the Province agrees to it). After that, AREVA (or Orano Canada Inc., after they change their name) hopes to wash its hands of any liability and transfer the site to the province in 2019.

The Saskatchewan government can say “no” to this transfer and require more work to be done to contain the radioactive waste. If you feel that we need to demand better, please make your thoughts known to your MLAs and to the Hon. Dustin Duncan, Ministry of the Environment.

Val Drummond
MacDowall