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Oral Presentation

Submission from Rodney Gardiner

In the Matter of the

Orano Canada Inc. – Cluff Lake Project

Application for the renewal of the Uranium
Mine Decommissioning Licence for the
Cluff Lake Project

Commission Public Hearing

May 15, 2019

Exposé oral

Mémoire de Rodney Gardiner

À l'égard d'

Orano Canada Inc. – Projet de Cluff Lake

Demande de renouvellement du permis
de déclassement de la mine d'uranium de
Cluff Lake

Audience publique de la Commission

Le 15 mai 2019

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May 15, 2019

Submission to Canadian Nuclear Safety Commission Public Hearing, Ottawa, ON

RE: Orano Canada Request for Return of Funds for Cluff Lake

Please accept the following statement and request for action from northern Saskatchewan resident Rodney Gardiner, former General Foreman and Acting Site Manager for Cluff Lake Mine Decommissioning.

AREVA Safety Officer, Dale Huffman, states in an email to Rodney Gardiner on (February 15, 2019) "direct quote from Dale Huffman's email -- that animals are unlikely to burrow into radioactive material at Cluff Lake site, because the water table has now penetrated over 60% of the tailings management area (TMA). "

60% of the Cluff Lake TMA is 284 acres. 214 football fields.

If the water table has penetrated this area of tailings, this is a concern for the following reasons:

1. The tailings management area is unlined.
2. The tailings management area received one meter of unpacked till as a cover.
3. The tailings management area contains materials that were intended for concrete vault containment.
4. The tailings management area contains refined radioactive waste materials.
5. Harmful radionuclides leach into water.
6. Water-soluble pollutants such as radium 226 and its daughter products are transported in water.
7. Radium loses only half of its radioactivity over 1600 years, a long term concern.
8. Twelve years of site monitoring is less than 1% of the harmful half-life of radium.
9. Harmful effects of radium are expected to accumulate and increase over time, creating a need for special mitigation measures and funding.

In light of the points presented above, the undersigned submit:

It is our opinion that Orano Canada should not receive funds back from the Environmental Protection Fund as requested for Cluff Lake site.

Further, Orano Canada and its partners, including the Saskatchewan Mining Development Corporation should be assessed for the cost of capping off the Cluff Lake TMA with a minimum of 6m packed till, as per guidelines for effective mitigation of radon gas emissions.

Further, Orano Canada and Saskatchewan Mining Development Corporation should be required to fund the perpetual monitoring of the Cluff Lake site.

Signed in Ile-a-la Crosse, SK on this 14th day of April, 2019.

Rodney Gardiner