



September 27, 2018

VIA EMAIL

Mr. Brian Torrie
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Dear Mr. Torrie:

Cameco Corporation's Comments on draft REGDOC-2.10.1, Emergency Management and Fire Protection, Volume II: Framework for Recovery after a Nuclear Emergency

Cameco Corporation (Cameco) has reviewed and prepared the following comments on the draft REGDOC-2.10.1, Emergency Management and Fire Protection, Volume II: Framework for Recovery after a Nuclear Emergency (the REGDOC) for the Canadian Nuclear Safety Commission (CNSC).

REGDOC is not the appropriate regulatory instrument

As we stated in our submissions on DIS-17-01, *Framework for Recovery in the Event of a Nuclear or Radiological Emergency*, Cameco supports a unified framework for recovery activities after a nuclear or radiological emergency. It remains our view, however, that CNSC regulatory documents should be restricted to guidance documents for licensees and applicants in regard to regulated facilities and activities and not, as the REGDOC does, to assign roles and responsibilities for government departments and support agencies in relation to a public safety event. We strongly recommend that a CSA standard or Health Canada guidance document would be more appropriate to establish a framework for emergency recovery.

The following comments focus on sections of the REGDOC that have the potential to create public confusion or uncertainty.

Scope is not clear

The REGDOC could create confusion for the public because, although the document makes it clear that it applies to off-site recovery, "off-site" is not defined and it is not obvious that "on-site" refers to licensed facilities and off-site refers to all other locations. The Introduction section could address this by stating that the document provides guidance for governmental departments and agencies with respect to recovery actions outside licensed facilities.

Dose limits inconsistencies

One of the lessons learned from Fukushima was the importance of establishing science- and risk-based radiological reference levels for defined stages prior to an emergency as part of developing an efficient and effective recovery process. The *Existing exposure situation* in Figure 1 on page 6 and in Table 1 on page 11 of the REGDOC uses a dose limit up to 20 mSv when the Ontario's Provincial Nuclear Emergency Response Plan (PNERP) uses a default dose limit of 50 mSv independent of the exposure

situation. The figure and table also shows an *Emergency exposure situation* dose limit of 20-100 mSv when section 15(3) of the *Radiation Protection Regulations* (RPR) permits an effective dose limit of up to 500 mSv for a person who takes prescribed actions to prevent serious harm to persons or the environment.

We recommend that the guidelines in the recovery framework should be consistent with the PNERP and the RPR to prevent confusion and uncertainty during a recovery event.

Section 2.2 of the REGDOC also uses exposure situations that are not used in Ontario's Provincial Nuclear Emergency Response Plan (PNERP). Again, consistency is necessary to avoid confusion and uncertainty.

Community empowerment and self-help actions

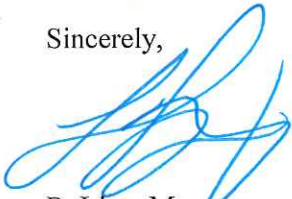
Cameco is concerned that the public could interpret section 4.2.2, *Empowerment of the public* and section 5.1.2, *Self-help actions* apply to emergency preparedness and not to recovery after an unlikely nuclear event. The REGDOC should emphasize that education and information for self-help, including radiation monitoring would be specific to the particular circumstances of a recovery process only and has no role in emergency preparedness.

Food chain activity concentrations

A key lesson from Fukushima is that science- and risk-based radionuclide activity concentrations in food and water from an affected area should be developed and published prior to a nuclear event. Although the REGDOC contemplates establishing criteria to manage long-term contamination of the food supply from long-lived radionuclides, it does not assign the responsibility for establishing activity concentrations for country foods not managed through the commercial supply chain to a government department or agency subject to the REGDOC. Cameco considers this a priority to avoid the public confusion that followed Fukushima.

If you have any questions with respect to the above, then please contact the undersigned at 306-956-6685 or liam_mooney@cameco.com.

Sincerely,



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