



**Written submission from the  
Canadian Nuclear  
Workers' Council**

**Mémoire du  
Conseil canadien des  
travailleurs du nucléaire**

In the Matter of the

À l'égard de

**Cameco Corporation, McArthur River  
Operation and Key Lake Operation**

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**Cameco Corporation, établissements de  
McArthur River et de Key Lake**

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Application for the renewal of uranium  
mine/mill licences for McArthur River  
Operation and Key Lake Operation

Demande visant le renouvellement des permis  
d'exploitation de mines et d'usines de  
concentration d'uranium pour les  
établissements de McArthur River et de  
Key Lake

**Commission Public Hearing**

**Audience publique de la Commission**

**June 7-8, 2023**

**7-8 juin 2023**



## Canadian Nuclear Workers' Council

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April 24, 2023

Members of the Commission

c/o Tribunal Officer, Commission Registry  
Canadian Nuclear Safety Commission  
280 Slater St PO Box 1046 Stn B  
Ottawa, Ontario  
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[Interventions@cnsccsn.gc.ca](mailto:Interventions@cnsccsn.gc.ca)

### Reference 2023-H6

### **Cameco Corporation's Application to Renew the Uranium Mine/Mill Licenses for their McArthur River and Key Lake Operations.**

Dear President Velshi and Members of the Commission,

Please accept this letter as the written submission from the Canadian Nuclear Workers' Council (CNWC) for the Public Hearing scheduled for June 7-8, 2023 regarding Cameco Corporation's (Cameco) Application to Renew the Uranium Mine/Mill Licenses for their McArthur River Operation (MRO), UML-MINE-MCARTHUR.01/2023, and their Key Lake Operation (KLO), UML-MILL-KEY.01/2023. The CNWC is in full support of Cameco's application. Unfortunately no one is available to provide an oral submission on behalf of the CNWC.

### **The Canadian Nuclear Workers' Council**

The CNWC was formed in 1993 as an association of Unions representing Workers across Canada's nuclear industry. CNWC Affiliates encompass uranium mines and mills, nuclear fuel manufacturing, nuclear power plant (NPP) operation and maintenance, engineering, NPP construction and refurbishment, medical isotope production, nuclear research and development, nuclear waste handling and decommissioning.

This includes United Steelworkers Local 8914 (USW local 8914) representing the Women and Men employed by Cameco at their Key Lake and McArthur River Operations as well as Employees of Athabasca Catering.

The goals of the CNWC are to:

- ensure the perspectives of Canada's Nuclear Workers are heard by decision makers,
- strengthen the collective role of Nuclear Workers via their Unions as partners in Canada's nuclear industry,
- enhance public knowledge about the benefits of Canada's nuclear industry, and
- share and learn from our experiences.

The CNWC engages in a number of activities to further these goals including a newsletter, website, updates to affiliated Unions, lobbying, outreach and an annual conference for CNWC Affiliates that we rotate amongst the various communities hosting Canada's nuclear facilities. We've previously held conferences in Saskatoon and had opportunities to tour Cameco's mine and mill facilities. Our conferences have provided a great opportunity for Affiliates to tour the broad spectrum of Canada's nuclear facilities and learn more about the industry.

Safeguarding the continued health and safety of Workers is always the priority for the CNWC and all of our Affiliates. Our consistently high standards of occupational health and safety result in better environmental stewardship.

The CNWC is a regular participant in this regulatory process. <https://cnwc-cctn.ca/>

In preparation for this submission we reviewed the Commission Member Documents (CMD) for this hearing found on the CNSC website, CMD 23-H6 submitted by CNSC Staff and CMDs 23-H6.1 and 23-H6.1A submitted by Cameco.

Cameco's application was also discussed with the President of USW local 8914, Mr. Dallas Wunschke.

### **Cameco's Application**

We support Cameco's application to renew the Uranium Mine/Mill Licence for their McArthur River and Key Lake Operations.

During the term of the current licence Cameco has met all regulatory requirements and demonstrated good safety performance. Their managed systems for all Safety and Control Areas (SCA) are effective and mature. We have no reason to believe that commitment to operating safely won't continue.

The only subject we would like to note is the return from Care and Maintenance. This has resulted in a number of new Staff on site. We're not aware of any specific issues, we're only identifying this as cause for vigilance.

## **CNSC Staff's Assessment on Cameco's application**

The CNWC is in full support of CNSC Staff's assessment of Cameco's renewal application as set out in CMD 23-H6. We believe they have reached the appropriate findings and conclusions, specifically:

- Cameco has programs, resources, and measures in place at the MRO and KLO to ensure the health and safety of persons and the environment during the proposed licence period.
- Cameco is qualified to carry on the activities authorized by the proposed licence(s).

We support CNSC Staff's recommendations, specifically:

- The Commission issue the proposed licence for the McArthur River Operation, UML-MINE-MCARTHUR.00/2043.
- The Commission issue the proposed licence for the Key Lake Operation, UML-MILL-KEY.00/2043.

We support fully CNSC Staff's assessment and conclusion regarding the proposed 20-year licence as found in Table 5.1.

## **Concluding Remarks**

Cameco Corporation has a proven history as a responsible Operator of various nuclear facilities in Canada including their Key Lake and McArthur River Operations. The CNWC is in full support of Cameco's application and CNSC Staff's recommendation that the Commission issue the proposed licence renewal.

I would once again like to thank the Commission, CNSC Staff and all Intervenors. This public process and strong regulatory oversight serve to protect the environment and maintain the high level of health and safety in our workplaces and our communities.

Respectfully submitted,

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