



File / dossier : 6.01.07

Date: 2023-01-12

Edocs: 6950746

**Written submission from  
Denison Mines Corp.**

**Mémoire de  
Denison Mines Corp.**

In the Matter of the

À l'égard de

**Orano Canada Inc., Cluff Lake Project**

---

**Orano Canada Inc., Projet de Cluff Lake**

---

Request to Revoke the Current Licence and  
Release the Cluff Lake Project to the  
Institutional Control Program

Demande visant à révoquer le permis pour le  
projet de Cluff Lake et à transférer la propriété  
au Programme de contrôle institutionnel

**Commission Public Hearing**

**Audience publique de la Commission**

**March 1, 2023**

**1<sup>er</sup> mars 2023**

January 12, 2023

Commission Secretariat  
Canadian Nuclear Safety Commission (CNSC)  
280 Slater Street  
P.O. Box 1046, Station B  
Ottawa, Ontario K1P 5S9

Dear Commission Secretariat:

**Re: Commission Hearing: Orano Canada Inc. Application to Revoke Licence and Release the Cluff Lake Project to the Saskatchewan Institutional Control Program**

Denison Mines Corp. (Denison) would like to express its support for the application submitted by Orano Canada Inc. (Orano) to revoke the Cluff Lake Project Uranium Mine Licence and release the site to the Saskatchewan Institutional Control Program (IC Program).

As Orano's partner in the McClean Lake Joint Venture (MLJV), Denison is in a unique position to comment on Orano's professionalism, integrity, and effectiveness as an operator in northern Saskatchewan. Accordingly, we trust that (i) the process to arrive at this hearing was inclusive and (ii) the determinations supporting the release of the project to IC are sound.

Additionally, we want to express particular support for the IC Program, which promotes responsible development in Saskatchewan and exemplifies the importance and value of:

- Defined closure criteria, with appropriate long-term post-closure monitoring
- Emphasis on unrestricted land use post-closure
- Early planning for and achieving safe (chemically, physically, radiologically) land use post-closure
- Collaboration and coordination of responsible authorities
- Protection of the public from the financial burden of post-closure monitoring

As an active project operator and owner with several properties at various stages of exploration, development, and post-closure care and maintenance, Denison understands the importance of 'beginning with the end in mind' (i.e., early decommissioning planning and understanding the desires of interested parties for post-closure land use). Denison's Wheeler River Project is located in Saskatchewan's Athabasca Basin region, and it is our current intent to plan, operate, and decommission in a manner that leads to the eventual transfer of the site into the IC Program. We believe this should be the preferred route for the closure of current and future uranium mining operations.

This preference is based on our firm belief that (i) the province of Saskatchewan is a responsible and capable authority, (ii) adequate funding for the long-term monitoring and maintenance plan will be provided by responsible operators (including Orano), and (iii) adequate regulatory mechanisms are in place to re-engage the CNSC if required (*Nuclear Safety and Control Act* 45(b) and 43(3)).

Therefore, Denison is pleased to provide support for this application.

Yours very truly,

**DENISON MINES CORP.**



David Cates  
President and Chief Executive Officer