

CEAA, A Challenge to Continual Improvement: One Industry's Experience

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CEAA, A Barrier to Continual Improvement

- ◆ Cameco – Brief overview
- ◆ CEAA
- ◆ CEAA – Problems
- ◆ Cameco's concerns with CEAA
- ◆ Conclusions
- ◆ Recommendations

Cameco: Background

- ◆ Nuclear Energy Company
 - ◆ Uranium fuel
 - ◆ Generating electricity
- ◆ International
 - ◆ Canada (U)
 - ◆ USA (U, Au)
 - ◆ Kyrgyzstan, Mongolia (Au)
 - ◆ Kazakhstan (U)

Cameco: Dominant Nuclear Energy Company

- ◆ Key Success Measures
 - ◆ Healthy workplace
 - ◆ Clean environment
 - ◆ Supportive communities
 - ◆ Shareholder return
- ◆ Triple Bottom Line
- ◆ Continual Improvement

CEAA

- ◆ Federal EA Legislation
- ◆ Triggered by Proponents Need for
 - ◆ License
 - ◆ License amendment
 - ◆ Project on the Comprehensive Study List
- ◆ CNSC our lead Regulatory Authority (RA)

CEAA: Problems

- ◆ Complex, open to interpretation
- ◆ Imprecise guidance on key principles
- ◆ Inflexible to change in project scope
- ◆ Can be hung-up over points of scientific debate
- ◆ Comprehensive List not risk-based or scaleable

CEAA: Problems

- ◆ Exclusion List inadequate for existing modern industrial facilities
- ◆ Does not allow for creative mitigations
- ◆ Does not reward proponents for beneficial or benign projects. Process over substance.
- ◆ Does not specifically require parallel licensing and EA

Cameco's Problems

- ◆ Failure to get timely approvals
 - ◆ Even small, low risk projects tied up in EA/licensing
 - ◆ EA and licensing, serial not parallel
 - ◆ Conservative interpretations of CEAA
 - ◆ CEAA interpretation left to RA

Cameco's Problems

- ◆ Slow start to process
 - ◆ Failure of fed./prov. harmonization
 - ◆ Long guidelines process
 - ◆ Perceived vs. real risk
 - ◆ Additional CNSC process before Commission

Cameco's Problems

- ◆ Inability to Incrementally Decommission
 - ◆ Comprehensive study
 - ◆ Expensive/time consuming
 - ◆ Not appropriate to all properties
 - ◆ Some low risk/benign

Cameco's Problems

- ◆ Lack of Balanced Assessment
 - ◆ Assessment based on absolutes
 - ◆ Social and economics considered in EA, but not as screening factors
 - ◆ Assessment based on compounding conservatisms
 - ◆ Mitigations absolute, not managed

CEAA

- ◆ Potentially very flexible
 - ◆ Most CEAA screening issues at discretion of the RA
 - ◆ Can be risk based
 - ◆ Currently latitude on significance – up to RA
- ◆ CNSC also recognizes problems
 - ◆ Initiating process of change

Conclusion

- ◆ With the recommended improvements, CEAA could be used to promote sustainability, rather than act as a barrier to continual improvement.
- ◆ RA has the powers to help in short term, but long term regulatory changes needed
- ◆ Don't want to throw out economy with the environmental bath water – not mutually exclusive and CEAA must reflect this

CEAA Recommendations

- ◆ CEAA, and CNSA, need to be amended to include economic considerations
- ◆ Generic guidelines for all screenings
- ◆ Comprehensive Study List, allow risk assessment
- ◆ Specifically require RA to parallel licensing and EA

CEAA: Recommendations

- ◆ Allow creative mitigations
- ◆ Allow RA discretion at determination stage to fast track beneficial projects (not all change adverse)
- ◆ Provide clear guidance on key items
 - ◆ Significance, cumulative, etc.
 - ◆ Co-ord. all fed. regulation for EA use
- ◆ Scientific adjudication – single issue

Thank You

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