



VIA EMAIL

October 18, 2013

Mr. Mark Dallaire
Director General
Regulation Policy Directorate
Canadian Nuclear Safety Commission
PO Box 1046, Stn B
280 Slater Street
Ottawa ON K1P 5S9

Dear Mr. Dallaire:

**Re: Comments on REGDOC-2.10.1 Emergency Management and Fire Protection Nuclear
Emergency Preparedness and Response**

AREVA Resources Canada Inc. (AREVA) appreciates the opportunity to comment on CNSC Regulatory Document REGDOC 2.10.1: *Emergency Management and Fire Protection: Nuclear Emergency Preparedness and Response*. AREVA is in general agreement with the comments provided by the Canadian Nuclear Association (CNA) and would like to add the following general comments for your consideration:

Uranium Mines and Mills (UMM) do not fit well within this regulatory document, and we would prefer that UMM are not included. It seems that the document has been written for nuclear power plants (NPP) with secondary consideration of UMM to enable the elimination of G-225, *Emergency Planning at Class I Nuclear Facilities and Uranium Mines and Mills*. Regulatory Guide G-225 together with provincial requirements in Saskatchewan sufficiently defines the expectations of UMM for emergency preparedness and response. The consolidation of advice into a single regulatory document risks confusing UMM licencees and CNSC Project Officers on the applicability of much of the content of the document to UMM. For example, the need for 15 minute notification of activation of the emergency response organization (ERO) or providing the CNSC with workspace are more appropriate for NPP than UMM. Another important reason is that UMM have little, if any, potential for a “nuclear emergency” as defined by Health Canada as *an emergency which has led, or could lead, to a radiological threat to public health and safety, property, or the environment*”. Emergency preparedness and response for UMM focuses on risks which are generally non-nuclear in nature.

AREVA Resources Canada Inc.

P.O. Box 9204 – 817 - 45th Street West – Saskatoon, SK S7K 3X5 – CANADA
Tel: 1 (306) 343-4500 – Fax: 1 (306) 653-3883 – Web Site: www.aveva.ca



Alternatively, should UMM remain to be included in REGDOC 2.10.1, AREVA expects that clarity on applicable sections would be needed in licencees' Licence Condition Handbooks (LCH) rather than referencing the regulatory document in its entirety as a license basis document in order to eliminate any risks of confusion.

If you require any additional information or clarification regarding this submission, please feel free to contact the undersigned at tammy.vanlambalgen@areva.ca or (306) 343-4569.

Yours truly,

A handwritten signature in blue ink that reads 'Lambalgen' in a cursive script.

Tammy Van Lambalgen
Vice President Regulatory Affairs & General Counsel

/SASK 1045-63

cc: ARC Distribution