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Canadian Nuclear Safety Commission  
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**Cameco's Comments on Discussion Paper DIS-24-02, Proposal to amend REGDOC-2.13.2, *Safeguards and Non-proliferation: Import and Export***

Cameco Corporation (Cameco) is one of the largest global providers of the uranium fuel needed to energize a clean-air world. Utilities around the world rely on our nuclear fuel products to generate power in reliable and carbon-free nuclear reactors. Our operations range from exploration and uranium mining to the manufacture of nuclear fuel. Cameco participated in industry discussions on the proposed changes to REGDOC-2.13.2, *Safeguards and Non-proliferation: Import and Export* (the REGDOC) and has prepared the following comments.

**Section 2.3 – What examples of intangible transfers involving controlled nuclear information should the CNSC include in the REGDOC?**

Intangible transfers are not clearly and reasonably defined based on today's realities of work travel requirements where many workers travel with their encrypted mobile devices. With the growth of virtual workplaces and cloud-based systems, the number of potential intangible transfers has increased (e.g., Teams calls, spam filters located outside Canada, email servers located outside Canada, etc.). To reduce the significant regulatory burden to maintain import/export programs to reflect the modern workplace, exemptions should be included to allow workers to travel with encrypted devices or access controlled nuclear information from approved countries.

**Section 2.6 – New appendices – Appendix G: Guidance to applicants on creating a written process for the import and export of controlled nuclear substances, equipment and information**

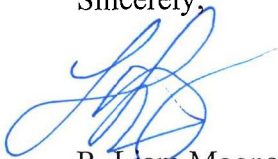
Cameco would suggest clarifying in the guidance of Appendix G that documented import and export processes do not need to be submitted for every licence application. To avoid creating an

unnecessary administrative burden, the requirement should confirm that once the process has been established, only significant changes to the process would require updating.

The REGDOC would benefit from revisions that reflect and facilitate the modern, interconnected workplace and reduce the administrative burden without increasing risks to nuclear safety, such as those outlined above.

If you have any questions with respect to the above, then please contact me at [liam\\_mooney@cameco.com](mailto:liam_mooney@cameco.com).

Sincerely,



R. Liam Mooney  
Vice President  
Safety, Health, Environment, Quality & Regulatory Relations, Cameco Corporation