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**Cameco's Comments on Discussion Paper DIS-24-03, Proposal to amend REGDOC-2.13.1, *Safeguards and Nuclear Material Accountancy***

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 has reviewed the proposed changes to REGDOC-2.13.1, *Safeguards and Nuclear Material Accountancy* (the REGDOC). The regulations made pursuant to the *Nuclear Safety and Control Act* and Canadian Nuclear Safety Commission (CNSC) REGDOCS should remain aligned with the Agreements between Canada and the International Atomic Energy Agency (IAEA). Given this principle, we are concerned generally that summarizing safeguard requirements or providing additional guidance in the REGDOC will result in the expansion of burdensome requirements that go beyond those activities permitted in the Safeguard Agreement and Additional Protocol.

Cameco participated in industry discussions on the proposed changes and has prepared the following specific comments.

**Section 2.2 - Would it be useful to add examples of what items containing nuclear material and what nuclear-related activities are subject to safeguards?**

Cameco believes that it would be useful to include examples of what is subject to safeguards, as well as clarifying those materials or activities that are not subject to safeguard reporting. For example, the CNSC has previously provided clarification to uranium mines and mills that uranium ore and uranium ore within a mining or milling process circuit is exempt from safeguard reports. This example should be included to reduce regulatory uncertainty for licensees.

**Section 2.3 – Would it be useful to add a table to describe what the reporting and access requirements are for the different categories of licensees and non-licensees?**

Including a table that clearly shows the reporting and access requirements for the different categories of licensees can be useful; however, the REGDOC should ensure that it remains aligned with the Safeguard Agreement and Additional Protocol to prevent introducing burdensome requirements and activities that are not permitted.

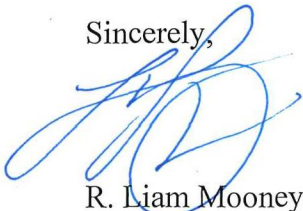
**Section 2.9 Complementary Access**

Cameco is concerned with the statement in the Discussion Paper that the “list of activities the IAEA may perform during a complementary access will be expanded to align with Article 6 of the Additional Protocol” and that the CNSC will clarify requirements and guidance for handling IAEA photographs captured during complementary accesses. For uranium mines and mills, photographs are not included in the IAEA’s permitted activities under Article 6b. Further, complementary access is permitted to assure the absence of undeclared nuclear material and activities, which is not determined by photographs. Cameco would suggest that any clarifications in the REGDOC remain aligned with the purposes for complementary access and avoid introducing new requirements.

In summary, any additional guidance included within the REGDOC should clearly outline the expectations and permitted activities that are subject to safeguard and nuclear material accountancy as documented in the Safeguard Agreement and Additional Protocol between Canada and the IAEA.

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