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Canadian Nuclear Safety Commission  
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To Whom It May Concern:

In accordance with Section 5, "*Considerations for Potential Amendments to the Regulations and Anticipated Impacts*", I would like to provide some comments on the PTNSR for "better alignment with the IAEA's Regulations for the Safe Transport of Radioactive Material (SSR-6)".

Comment 1: Remove the 3% mass limit from subsection 5(1)(a) of the PTNSR

The Canadian definition of LSA differs from the international regulations (SSR-6, IMO, ICAO, and USA) and in Canada, when the ore has greater than 3% by mass of uranium or thorium, it has to be classified as LSA-II. This classification causes issues in exporting countries as the classification of the material is different in Canada only. In all other countries, natural uranium and thorium is classified as LSA-I (as defined in the international regulations). The classification of LSA should be universal and be consistent with the international regulations to facilitate the import of the critical materials. When classified as LSA-II, it requires a more robust package and it increases the packaging costs. The LSA-I Canadian definition allows for Uranium Ore Concentrate to be classified as LSA-I which could be up to 88% Uranium with 12% Oxygen in the form of UO<sub>2</sub>. Uranium ore having above a 3% concentration has no greater risk than uranium ore concentrates.

Comment 2: Remove the restriction in subsection 27(1) of the PTNSR

The Canadian transport requirements for LSA differs from the international regulations (SSR-6, IMO, ICAO, and USA) and in Canada, when the LSA material is transported, Section 27 of the Packaging and Transport of Nuclear Substances Regulations SOR-215-145 require LSA to be transported in Type IP-3 packages. While Section 27(3) provides an exception for certain conditions, not all of the transports can meet those conditions (for example, sample shipments by air). Because of the additional





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Canadian regulations, shipping in a Type IP-3 packages increases the cost for transport in Canada. No other country has this additional requirement for LSA material and with the lack of harmonization with the international regulations, the Canadian restriction causes an extra burden for the movement of critical minerals throughout Canada. This should be removed to harmonize with the IAEA regulations.

Comment 3: Automatic reporting requirements – dangerous occurrence

An additional opportunity to reduce the administrative burden without compromising safety would be to remove subsections 35(a) and 35(g) from the PTNSR. Both subsections require reporting on occurrences that are not safety significant events (for example, minor vehicle incidents where there is no impact on the packages). Dangerous occurrence reporting should align with the IAEA and be focused on situations where the dose rate and contamination limits are not met.

Best regards,

A handwritten signature in blue ink, appearing to read 'Steve Hansen'.

Steve Hansen  
Chief Compliance Officer  
TAM International LP