

SUBMISSION TO CANADIAN NUCLEAR SAFETY COMMISSION

**In Support of the Application for Extension of Exemption from
the Requirements of *the Nuclear Safety and Control Act* for the
Former Gunnar Mine and Lorado Mill Sites**

Prepared for Canadian Nuclear Safety Commission

By Saskatchewan Research Council

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Saskatchewan Research Council
125 – 15 Innovation Blvd.
Saskatoon, SK S7N 2X8
Tel: (306) 933-6758
Fax: (306) 933-7896

Table of Contents

| | |
|---|---|
| Introduction..... | 3 |
| Safety | 3 |
| Métis Nation Saskatchewan (MNS) CMD 09H15.2 Submission..... | 3 |
| Conclusion | 5 |

Appendix A – October 28 2009 Letter to MNS

Appendix B – Quality Control / Quality Assurance Coordinator Job Posting

Appendix C – Proposed Interim Draft Gunnar EA Schedule

Introduction

Saskatchewan Research Council (SRC) is pleased to provide the Canadian Nuclear Safety Commission (CNSC) with the supplemental information contained in this document. SRC is submitting this to provide clarification on certain matters, provide updated information that was not in the original submission and to address the concerns of the CMD 09H15.2 submission from the Métis Nation of Saskatchewan.

Safety

SRC would like to reinforce the fact that there are physical hazards present at the site. SRC is anxious to proceed with the demolition of the existing infrastructure at the Gunnar Mine Site given the public safety risks. There is evidence of unauthorized usage and salvage of the buildings onsite which may expose the public to physical hazards.

Unauthorized Salvage



Structurally unsound building



SRC understands that it must adhere to the regulatory process but will be looking for flexibility where possible to proceed with the demolition of the buildings.

Métis Nation Saskatchewan (MNS) CMD 09H15.2 Submission

The MNS submission outlines a number of concerns related to the project. This portion submission will attempt to address those concerns on a case by case basis.

1. Unacceptable rate of pay offered to UCML workers.

SRC has established pay structures and based on the job description for the position of Quality Control/Quality Assurance Coordinator it was determined that the wage being paid was an appropriate amount.

2. Unacceptable rate of pay for provision of Indigenous knowledge.

The tradition knowledge (TK) studies for the project have not yet started. A letter was mailed to the MNS, addressed to Mr. Doucette on October 28, 2009. The letter is attached in Appendix A and addresses our request to seek guidance on how to best approach the engagement of the MNS and proper collection of TK.

3. SRC's Policy for hiring local members is unfair.

A meeting was held in Uranium City on May 6, 2009 to update citizens regarding the satellite mine rehabilitation work that was about to begin. Concerns were raised about the quality control of the work being conducted onsite. The community suggested SRC hire a local resident to confirm quality. Shortly thereafter a job posting was placed in the post office in Uranium City (see appendix B). SRC only received one response to the ad, and that person was hired by SRC in late June as a Quality Control/Quality Assurance Coordinator.

AECOM hired a number of local assistants to aid in the field data collection and hourly rates were in comparison of SRC's rates. Each person was paid an hourly rate and a fee for use of their own equipment (boat rental). Accommodations and meals were covered for all field crew staying at Jug Bay and stand-by time was paid during weather delays.

4. The UCML has been invited to meetings in Fond du Lac and Saskatoon to deal with the Gunnar Mine Site, but have had to decline the invitations due to the fact that they have no financial capacity to travel outside of Uranium City.

SRC has provided and will continue to cover, all travel, food and lodging expenses for all invitees of any meeting hosted by SRC in relation to this project.

5. SRC is flying into Uranium City for one or two days, delivering their Powerpoint presentation and leaving.

SRC has established a full time seasonal office in Uranium City. It was operational from May 2009 until October 2009. During this time there was always a minimum of one representative from SRC in Uranium City. SRC intends to continue this practice during summer 2010.

6. The October 7/8th Meeting was not effective as that meeting was co-hosted with Cameco.

Cameco is managing the Beaverlodge Site which is located near Uranium City. The costs associated with bringing people to Uranium City are very high and when available, SRC takes advantage of sharing transportation costs as it did with Cameco for the October 7/8th meeting.

7. No Métis participation on the October 8, 2009 Gunnar Tour.

SRC had booked a Twin Otter plane for a tour of the Gunnar Mine Site on October 8, 2009. The airplane booked has the capacity to take 15 passengers. Unfortunately due to fuel and weight restrictions, the plane could only take 10 people. Allen Augier the UCML VP was scheduled to participate, however since he lives in Uranium City and had been onsite regularly during the summer field work, it was our decision that he stay behind. A

number of Provincial government employees as well as SRC staff were also unable to attend due to the weight restrictions. It's unfortunate that not all could attend.

8. The MN-S has not received a report from the SRC with results of the October 7th meeting?

All of the meeting notes from every public meeting that SRC hosts are posted on our CLEANS website dedicated to the Gunnar, Lorado and satellite mine rehabilitation projects. www.saskcleans.ca

9. The MN-S is unaware of any efforts on behalf of SRC to resolve the concerns presented at the September 17, 2008 hearing.

A Project Review Committee (PRC) was established jointly by the SRC and the leadership of the seven Athabasca Region Communities potentially affected by the project. Shortly after September 17, 2008 a local MN-S was formed known as MN-S Local 50. The President of the MN-S Local 50 was then appointed to the PRC.

SRC obtained the services of AECOM in June 2009 to assist in the Environmental Assessment and development of the Environmental Impact Statement of the Gunnar Rehabilitation project. It wasn't until the end of October 2009 that the field data for the project was collected, which SRC deemed necessary for further engagement related to the Gunnar rehabilitation. Armed with this data, continued engagement is being planned for all communities affected by the project, including the MN-S. The first step in this process was the October 9, 2009 letter previously mentioned that was sent to Mr. Doucette. SRC is very keen to receive advice from the MN-S on how meaningful engagement should take place. We will meet with them prior to completing a detailed engagement plan.

10. Proposed Project Interim Schedule.

The schedule is as it states in the title only proposed. As such, it was included to provide the Commission with a general timeline of activities related to the submission of the Environmental Impact Statement. A revised, proposed schedule is attached in Appendix C. The traditional knowledge study concerns are addressed in bullet number 2.

Conclusion

SRC's overriding priority is safety. Protection of people and the environment is something we take very seriously. Our intention is to keep this project moving ahead in a safe and sustainable manner. After years of neglect, progress is being made on cleanup of more than 30 sites in the Athabasca region. This is a good news story for the people that call this area home and SRC fully intends to complete the Gunnar rehabilitation in a safe and respectful manner.

A large part of this project includes engagement of Athabasca region residents. SRC will continue with discussions with northern communities to enable meaningful participation in determining the best options for reclamation. These discussions include consultation with a variety of Aboriginal communities and organizations including the Métis Nation of Saskatchewan.

APPENDIX A



October 28 2009

President, Robert G. Doucette
Métis Nation Saskatchewan
219 Robin Crescent
Saskatoon, SK S7L 6M8

Dear: President Doucette

I am writing today on behalf of the Saskatchewan Research Council (SRC). The Cleanup of Abandoned Northern Sites or Project CLEANS is a multi-year project to assess and reclaim Gunnar, Lorado and 36 satellite uranium sites in Northern Saskatchewan.

As the project management entity for Project CLEANS, the SRC is responsible for developing and implementing the reclamation plan, liabilities management, obtaining approvals and licenses, as well as preparing an Environmental Impact Statement (EIS).

The Gunnar mine site cleanup is one part of Project CLEANS. AECOM has been hired to assist SRC in conducting environmental and engineering studies and analyses in and around the Gunnar mine site this summer, which began in August of 2009. These studies will support the Gunnar Mine Site Environmental Assessment (EA).

A core part of the EA is the collection and incorporation of the traditional knowledge and traditional land use of the Aboriginal people affected by the project. In partnership with AECOM, Kuni Albert of Albert & Associates Ltd. is responsible for this component of the Gunnar Mine Site EA.

SRC is respectfully requesting your attention and seeking your guidance on how best to approach the engagement of the Métis communities in relation to the Gunnar Mine Site EA and the collection of traditional knowledge and traditional land use.

We would be pleased to meet with you to discuss this project. We are available to meet with you at your convenience here in Saskatoon.

Sincerely,

Aaron MacDonell
Cleans Project Manager

APPENDIX B

"Experience the Next Frontier" and explore career opportunities with the Saskatchewan Research Council (SRC). Our mission is to help the people of Saskatchewan by strengthening the economy with quality jobs and a secure environment. We accomplish this through research, development and the transfer of innovative scientific and technological solutions. If you are looking to join a team that provides the people of Saskatchewan with a competitive edge in the global economy, SRC may have a career opportunity for you!

**Contractor Quality Control/Quality Assurance Coordinator
(Ref: CQC/QA-REM)
(Term: June to September 2009)**

The Environment and Forestry Division is seeking a Contractor Quality Control (QC)/Quality Assurance (QA) Coordinator, based in Uranium City, to verify contractor work.

Position details:

- Monitor contractor safety meetings and procedures
- Ensure contractor follows scope of work specified in RFPs and report progress to the SRC project manager
- Verify contractor timesheets
- Log site activities including photographic records of closure methodologies, closure specifications etc.
- Document locations of waste sites and monitor sites for gamma radiation
- Advise project manager of any emerging issues
- Perform other duties as assigned by the project manager.

As the ideal candidate, you have adequate uranium mining experience. You have excellent diplomacy and communication skills. You are currently living in Uranium City.

The deadline to apply is Thursday, June 11, 2009.

E-mail applications are preferred. E-mail to humanresources@src.sk.ca,
Mail to Human Resources 125 – 15 Innovation Blvd.,
Saskatoon, SK S7N 2X8, or Fax to (306) 933-7446. www.nextfrontier.ca
Please quote reference number CQC/QA-REM



Only those applicants considered for an interview will be contacted.

Since SRC is an employment equity partner with the Saskatchewan Human Rights Commission, we have permission to preferentially hire an aboriginal candidate for this position.

APPENDIX C

Gunnar Mine Site Rehabilitation Project Draft for Discussion

| ID | Task Name | Duration | 2009 | | | | | | | | | | | | 2010 | | | | | | | | | | | | 2011 | | | | | | | | | | | | 2012 | | | | | | | | | | | |
|----|---|------------------|-------|-----|-----|-------|-----|-----|-------|-----|-----|-------|-----|-----|-------|-----|-----|-------|-----|-----|-------|-----|-----|-------|-----|-----|-------|-----|-----|-------|-----|-----|-------|-----|-----|-----|-----|-----|------|-----|-----|-----|-----|-----|-----|-----|--|--|--|--|
| | | | Qtr 1 | | | Qtr 2 | | | Qtr 3 | | | Qtr 4 | | | Qtr 1 | | | Qtr 2 | | | Qtr 3 | | | Qtr 4 | | | Qtr 1 | | | Qtr 2 | | | Qtr 3 | | | | | | | | | | | | | | | | | |
| | | | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | | | | |
| 1 | GUNNAR MINE SITE REHABILITATION PROJECT - EA | 882 days? | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Rehabilitation Options / Project Description | 216 days | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Define Criteria/Objectives | 3 days | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | Preliminary Engineering | 135 days | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 11 | Engagement and Communications | 429 days? | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 12 | Community Meetings | 74 days | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 17 | Options Workshop Series 1 | 53 days | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 23 | Options Workshop Series 2 | 51 days | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 29 | Open Houses / General Public Consultation | 429 days? | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 31 | Regulatory Engagement: Province, Federal, PAGC | 259 days? | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 37 | Traditional Knowledge Program | 194 days | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 45 | Socio-economic Program | 192 days | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 52 | Prepare EIS | 475 days | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 70 | EA/CNSE Review Process | 229 days | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 77 | Procurement and Mobilization | 125 days | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

113308_GunnarEA_Schedule_23Nov09_v3_gf
Date: 17 Sept 2009

| | | | | | | | | | |
|-------|--|-----------|--|-----------------|--|--------------------|--|----------|--|
| Task | | Progress | | Summary | | External Tasks | | Deadline | |
| Split | | Milestone | | Project Summary | | External Milestone | | | |