

From: Gerard_Zaluski@cameco.com
To: licensing@nunavutwaterboard.org
Subject: comments on draft SIGs
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Phyllis,

I reviewed the SIG related to mineral exploration (exploration remote camp questionnaire), as that is the one applicable to us. While I understand the objective of the spreadsheet, I see this as a lot of extra work that is required by the applicant and think there could be a better approach. Firstly, to my understanding the applicant still needs to write some form of document similar to the former water license and remote camp questionnaire. We still need to provide the separate documents like the AR Plan, U exploration plan, spill response plan, etc. Then, we need to fill out this separate series of tables with 6 columns of information, specifying the file name, report author, document section, etc for each question in the SIG. Filling out the SIG form will take almost as much time as the documents that it is referencing, so it is a way greater work requirement. For instance to fill in water use (eg. 53 m3/day), it is just entering a number value, but then you also have to fill in in the SIG section 3.0, whether the information requirement is applicable, the title, author, or date of the document where it states that is our requested water consumption, the file name of the file where it states that is our requested water consumption, the section of the document, and if not available, where the information is. Repeat all those fields to be filled in for every question in the multiple pages of the document and that is more documentation than information. While that type of an index system may be applicable to some questions (AR plan, spill response plan, etc), many of the fields are really just yes/no or short answers, that could be filled into an Excel field directly, rather than taking all that extra work. Having all those field (referencing documents) isn't even applicable for things such as application fee, water use fee, information required to satisfy the requirements of the SIG...

To me it would make more sense to have a standard document template (eg. a fixed Word document with fixed headings and subheadings) in which the applicant would fill in the required information. Then the reviewer would just have to go to that specific section (there could be a hyperlinked table of contents) and all the information could be found there. To me that would make everything in a logical place without the need to put all the extra effort into a separate index document like the SIG Excel template.

The other issue we have found with the applications is that there aren't any clear guidelines for what is required for certain documents, activities, etc. For instance, on the old questionnaire, there was a field to enter information describing abandonment and restoration but no discussion about the need for a separate document nor an outline of what was required in the document. Then, we were asked to provide an AR plan, without those guidelines. Basically, everyone just finds another example from the NWB website (produced by another company) and then bases it on that. That happened as well with the Uranium Exploration Plan. We had supplied virtually all of that information in a couple different documents but I was told that it must be put into a separate, stand-alone document outlining the aspects related to radiation safety, storage, disposal of radioactive cuttings, etc. However, there was no outline of what was required either as headings in the document or requirements on the

procedures. It was therefore a bit of a guessing game, so I looked at a few I found on the website and adjusted accordingly. That worked okay but to me would make more sense if we could be told what was expected and then we had to explain how we would achieve those. Perhaps if there were some guidelines laid out or else some industry best practices (that were practical for the Nunavut environment) put into place it would make things easier for both the applicants, regulators, and inspectors.

In all of our mining and exploration operations Cameco has a strong commitment to the environment and sustainable development. Therefore, I can assure you that we are not trying to lower the expectations. We just want to make the system more efficient and effective, so we can all more effectively do our jobs. If the NWB, together with the government of Nunavut, INAC, and industry is interested in establishing some best practice procedures for the exploration/mining industry, Cameco would be very willing to participate in that process.

If you have any questions or comments on this feedback, I would be happy to discuss these with you.

Regards,

Gerard

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