


**Orano Canada Inc.**

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January 24, 2023

Licence Administrator  
Nunavut Water Board  
PO Box 119  
Gjoa Haven, NT  
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Dear Mr. Hunter,

**Re: Response to Comments from Crown-Indigenous Relations and Northern Affairs Canada's Review of the Renewal Application for the Kiggavik Project, Type B Water Licence No. 2BEKIG1823**

Orano Canada Inc. (Orano) appreciates the opportunity to respond to comments from interested parties regarding the NWB licence renewal for the Orano Kiggavik exploration project licence 2BE-KIG1823.

In the interest of clarity, Orano has responded to each comment separately below.

**1. Amendment Application Form Missing**

**CIRNAC Comment:**

The applicant states, in the Orano Kiggavik Exploration Licence Cover Letter and in the Orano Kiggavik Project Renewal Distribution Review documents, that there was an amendment application form submitted. This is a concern as there were no amendments identified in any other document but rather only a renewal application.

**Orano Response:**

Orano confirms this is a renewal application.

**2. Variety of Identified Plans or Documents Missing or Uncompleted Sections**

**CIRNAC Comment:**

Below is a list of plans, documents and sections missing from the application which were identified by the applicant as being part of the submission:

- a. EXP-740, Routine Radiological Monitoring Schedule and Associated Work Instructions (mentioned in the Radiation Protection Plan)
- b. Error messages appearing throughout the Spill Contingency Plan
- c. Appendix C Site Maps Missing (mentioned in the Spill Contingency Plan)
- d. Emergency Response Manual (mentioned in the Radiation Protection Plan)
- e. Emergency Response and Assistance Plan (ERAP) (Mentioned in the Radiation Protection Plan)
- f. Winter Road Plan (mentioned in the Spill Contingency Plan)
- g. EXP-740-05, Management and Disposition of Radioactive Drill Cuttings Document (mentioned in the Waste Management Plan)



### **Orano Response:**

Orano refers to many internal procedures, work instructions and forms in the Management Plans, including the Radiation Protection Plan and the Spill Contingency Plan and to include each referenced document is not the intent. The Management Plans demonstrate that Orano has planned and has the processes in place to operate in compliance with requirements.

Also, in the introduction to the current version of the management plans, Orano does indicate that the plan is not applicable during the care and maintenance phase but will be updated prior to a change in project phase to reflect the most current information. Also, all broken links will be corrected at that time. Orano will submit updated plans prior to changing phase.

### **3. Radioactive Storage Compound Measures Description Missing CIRNAC Comment:**

There is no mention of the measures in place, within the radioactive storage compound area, on how the radioactive materials are contained. This is a concern due to possible contamination spread into the environment and making its way into water bodies.

#### **Orano Response:**

The Radiation Protection Plan Section 3.3 describes the measures followed regarding storage of radioactive materials.

### **4. Infrastructure Locations in Relation to Water Bodies Not Clear CIRNAC Comment:**

The location of the infrastructure in relations to water bodies is not clear (note that there is a list of infrastructure in the Abandonment and Restoration Plan section 2.3 and also mention of sea containers for example, however this is not an exhausted list). This is a concern because of possible contamination making its way into water bodies.

#### **Orano Response**

The camp infrastructure is shown in relation to waterbodies in the figure Kiggavik Area Components included with the application.

### **5. Missing MSDS CIRNAC Comment:**

There were no provided MSDS in the Spill Contingency Plan. This is a concern because the MSDS provide valuable information on how to clean up spills.

#### **Orano Response:**

SDS are not included as part of the Spill Contingency Plan. They are available on site during the active exploration phase.

### **6. Single Chamber Incinerator Used CIRNAC Comment:**

In the Abandonment and Restoration Plan (under section 3.3 waste) the applicant states that they plan on using a single chamber incinerator. This is a concern due to the possibility of incomplete combustion and the release of dioxans and furans, which may allow contaminants entry into adjacent water bodies.

#### **Orano Response:**

The Abandonment and Restoration Plan Section 1 states "The applicable requirements in Section 3 were fulfilled in 2016 and will be considered



to be met until the project changes phase". The single chamber incinerator is the current incinerator on site. The incinerator will be reviewed against regulatory requirements at the time the project changes phase.

## **7. Inspection Schedule Not Clear**

### **CIRNAC Comment:**

In the Abandonment and Restoration Plan (under section 1 preamble) the applicant states that the site has demonstrated site stability and that they will therefore only be inspecting the site once every five years. However, in the Spill Contingency Plan (under section 1 introduction), it states that the site will be inspected yearly. This is a concern due to the lack of consistency within the documents. A clear schedule is needed to ensure that the site is being monitored regularly.

### **Orano Response:**

The NWB Renewal application section 9 indicates and aligns with the Abandonment and Restoration plan and states the Kiggavik project is inspected every five years, at a minimum. The Spill Contingency Plan will be updated when there is a change of project phase, as indicated in Section 1.

## **8. No Mention of Procedure When Artesian flow is Encountered**

### **CIRNAC Comment:**

There is no mention of what the procedure would be if an artesian flow is encountered during exploration. This is a concern due to possible contaminants making its way into water bodies.

### **Orano Response:**

The NIRB Screening Decision included with the renewal application Appendix A Summary of Proponent Commitments includes a commitment to immediately plug and permanently seal a drill hole with artesian flow. Orano also includes information on artesian flow encountered, if any, in the Kiggavik Annual Report.

## **9. Storage of Hazardous Materials Other Than Radioactive Materials and Fuel Cache not Identified**

### **CIRNAC Comment:**

The location and how the applicant plans on storing hazardous material other than fuel (diesel and Jet A) and radioactive material was not identified. This is a concern due to the possibility of spillage of hazardous materials going unnoticed which can possibly make its way into the surrounding water bodies.

### **Orano Response:**

In the Spill Contingency Plan Section 2.2 Petroleum and Chemical Product Storage and Inventory describes the storage of multiple products that may have larger quantities onsite. Other materials would not be stored in large quantities onsite. Any changes will be updated when the project changes phase and the Spill Contingency Plan updated.

## **10. Waste Storage Location Not Identified**

### **CIRNAC Comment:**

The waste storage location (such as but not limited to hazardous waste, non-hazardous waste, bulky items, ash, plastics, and scrap metal) was not identified. This is a concern due to the possibility of waste making its way into water bodies.

### **Orano Response:**



The Waste Management Plan describes these items in several areas, including Table 4.1 and section 5.2.

**11. Confirmation That All Activities Respect a Minimum of 31 Meters Boundary From Any Water Body**

**CIRNAC Comment:**

It is unclear that all activities will be conducted a minimum of 31 meters away from any normal high-water mark. This is a concern due to the increased possibility of contamination making its way into water bodies.

**Orano Response:**

The Uranium Exploration Plan confirms in section 3 that both drilling operation and core logging and storage area are located at a minimum 31m from the normal high-water mark of any nearby water bodies, unless approved. The Spill Contingency Plan also confirms this in section 3.2.

Regards,

DocuSigned by:

*Stephanie Forseille*

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Stephanie Forseille  
Coordinator, SHEQ Exploration