

February 7, 2023

Licence Administrator Nunavut Water Board PO Box 119 Gjoa Haven, NT X0B 1J0

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 CIRNAC's outstanding comments regarding the NWB licence renewal for the Orano Kiggavik exploration project licence 2BE-KIG1823 as described in the NWB letter dated January 30, 2023. The Kiggavik exploration project is currently in a Care and Maintenance phase with no work on site occurring or planned.

#### Orano Canada Inc.

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# 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.

#### **CIRNAC Comment:**

CIRNAC repeats comments and recommendation previously stated if there are any hazardous materials, in any quantity, being stored at the camp.

#### Orano Response:

Orano will update the Spill Contingency plan with the addition of an Appendix containing SDS for planned products requiring SDS when the project changes from a Care and Maintenance phase to the active 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

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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.

## **CIRNAC Comment:**

CIRNAC repeats comments and recommendation previously stated.

## **Orano Response:**

Orano will consider utilizing a dual chamber incinerator when the project returns to an active exploration phase. The Abandonment and Restoration Plan will remain the same while in the project is in the care and maintenance phase and will be update when the project returns to an active phase.

Regards,

-DocuSigned by:

Stephanie Forseille

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Stephanie Forseille Coordinator, SHEQ Exploration

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