



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
918 Nunavut Drive
Iqaluit, NU, X0A 3H0

Your file - Votre référence
2BE-YAT----
Our file - Notre référence
GCDOCS# 134727186

March 27, 2025

Robert Hunter
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

**Re: Crown-Indigenous Relations and Northern Affairs Canada's Response to Reply
on the Review of the Licence New Application for the Yath Project, Type B Water
Licence No. 2BE-YAT----**

Dear Robert,

Thank you for the March 20, 2025 invitation to review the reply to the referenced licence application, submitted by Generation Uranium Inc., for Type B Water Licence No. 2BE-YAT----

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*. Please find CIRNAC comments and recommendations in the attached Technical Memorandum.

The applicant shall provide confirmation from the Nunavut Water Board that all outstanding water license fees have been paid in full prior to approval of this application.

If there are any questions or concerns, please contact me at (867) 975-3877 or Joyce.Demers@rcaanc-cirnac.gc.ca or Andrew Keim at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca.

Sincerely,

Joyce Demers, B.Sc.,
Industrial Coordinator



Technical Review Memorandum

Date: March 27, 2025

To: Robert Hunter – Licensing Administrator, Nunavut Water Board

From: Joyce Demers – Industrial Coordinator, CIRNAC

Subject: Crown-Indigenous Relations and Northern Affairs Canada's Response to Reply on the Review of the Licence New Application for the Yath Project, Type B Water Licence No. 2BE-YAT----

Region: ☐ Kitikmeot ☒ Kivalliq ☐ Qikiqtani

CIRNAC provides the following comments and recommendations pertaining to the application package. A summary of the subjects of recommendations can be found in Table 1. Documents reviewed as part of this submission can be found in Table 2 of Section B. Detailed technical review comments can be found in Section C.

Table 1: Summary of Recommendations

Recommendation Number	Subject	Status
R1	Contact Information for CIRNAC	Not Resolved
R2	Waste Storage	Resolved
R3	Abandonment and Restoration Plan	Resolved
R4	Open Burning	Resolved
R5	Seasonal Shutdown	Resolved
R6	Bioremediation - Landfarm	Resolved
R7	Helicopter Landing Area and Airplane Strip	Resolved
R8	Spill Contingency Plan	Resolved
R9	Reporting Threshold Guidelines	Resolved
R10	Property Radiation Hazard Control Plan	Not Resolved
R11	Possible Radiated Water from Washing	Resolved



B. DOCUMENTS REVIEWED AND REFERENCED

The following table (Table 2) provides a list of the documents reviewed under the submission and reference during the review.

Table 2: Documents Reviewed and Referenced

Document Title	Author, File No., Rev., Date
250319 2BE-YAT---- 250310 - GEN Yath Property Abandonment and Restoration Plan-ILAE	Generation Uranium Inc., March 10, 2025
250319 2BE-YAT---- 250310 - GEN Yath Property Comments Response-ILAE	Generation Uranium Inc., March 19, 2025
250319 2BE-YAT---- 250310 - GEN Yath Property Radiation Hazard Control Plan	Generation Uranium Inc., March 10, 2025
250319 2BE-YAT---- 250310 - GEN Yath Property Spill Contingency Plan-ILAE	Generation Uranium Inc. , March 10, 2025
250319 2BE-YAT---- 250310 - GEN Yath Property Waste Management Plan-ILAE	Generation Uranium Inc., March 10, 2025



C. RESULTS OF REVIEW

1. Contact Information for CIRNAC

Comment:

Contact information for CIRNAC needs to be reviewed updated as some of the numbers provided are no longer in use. The concern is that in the event that CIRNAC needs to be contacted the applicant will not have the correct numbers to reach the desired personnel.

Recommendation:

(R-01) CIRNAC recommends that the applicant update CIRNAC contact numbers in all applicable plans.

Reply from Generation Uranium Inc:

“The CIRNAC contact information has been reviewed and updated in all the management plans.”

Response to Reply:

CIRNAC notes that the numbers below should be updated to reflect the following:

CIRNAC Manager of Field Operations (Jeremy Fraser)	Work: (867) 975-4553
CIRNAC Resource Management Officer in Rankin Inlet (Inspector) (Kyle Amsel)	Work: (867) 645-6795 Cell: (867) 645-2089
National Environmental Emergencies Centre (NEEC)	1-866-283-2333

10. Property Radiation Hazard Control Plan

Comment:

The Property Radiation Hazard Control Plan submitted to the Nunavut Water Board seems to be a draft version with comments that need to be addressed.

Recommendation:

(R-10) CIRNAC recommends that the applicant edit the plan to address comments addressed in the plan insuring that the revision control table is updated to reflect changes done to the plan. A final Plan is to be provided for review before a license should b issued.

Reply from Generation Uranium Inc:

The Radiation Hazard Control Plan has been internally reviewed and updated. The summary of changes are described below:



- Repetitive descriptions or sections were removed so that they only occur once in the document (i.e describing Alpha particles, Beta particles, and Gamma rays, exposure factors, PPE and hygiene procedures.
- Section 12 Drilling and Handling Radioactive Drill Core and Rock Chips was removed and condensed into a subsection of Activity Based Precautions.
- Sections 7 Training, 8 Worker Responsibilities, 10 Work Site Mitigation and Personal Hygiene, and 11 Personal Protective Equipment were removed and condensed into subsections of Section 6 Radiation Safety.
- Section 9 ALARA was removed as it is repetitive.
- Subsections 5.2 Exposure limits for Nuclear Energy Workers and 5.3 Exposure Limits for General Public were removed due to repetition.
- Personal hygiene was clarified as a preventative measure so that there is no implication of irradiated water (Subsection 6.3).
- Disposal procedure for contaminated PPE was added (Subsection 6.3)."

Response to Reply:

- a. CIRNAC notes that a revision control table needs to be added to ensure that all changes done between versions is clear and easily identifiable. Changes noted in the reply as well as the following need to be added to the table:
 - In the Radiation Hazard Control Plan under section 2 Regulatory Sources and Guidelines the original stated that "Generation Uranium will be registered with the National Dosimetry Services, Occupational Radiation Hazards Division of Health Canada (NDS)." However the newest version has that line omitted as well as other regulatory groups removed;
 - In the Radiation Hazard Control Plan under section 5 Radiation in Uranium Exploration has been modified.

Suggested table layout

Date of Change	Plan Version Number	Section Number	Summary of Changes Made

*Note that it is easier for CIRNAC to review revisions if the changes are also highlighted in some way.



CIRNAC notes that all modified plans need to include the revision table including the Property Radiation Hazard Control Plan, Property Abandonment and Restoration Plan, Property Spill Contingency Plan and Property Waste Management Plan.

- b. CIRNAC notes that in the original document labeled Property Radiation Hazard Control Plan under section 12.1 drilling states that “. Sealed drums containing drill cuttings will be temporarily stored on a flat dry outcropping, a minimum of 100 metres from the high-water mark of any waterbody, the location of which is yet to be determined.”

The new iteration of the Property Radiation Hazard Control Plan under section 7.2 drilling states that “Upon commencement of drilling, the drill crews are to be notified of the depth mineralization is expected. While awaiting transportation, mineralized core is to be stored 30 metres from the drill shack and at least 30 m away from the ordinary high-water mark of any water body.”

CIRNAC would like to note that all radioactive material be kept a minimum of 100 meters from the normal high-water mark of any water body.

- c. In the original Property Radiation Hazard Control Plan under section 12.1 drilling states that “Any drill hole that encounters mineralization with a uranium content greater than 1.0 percent U₃O₈ over a length of > 1.0 metre, and with a metre-per-cent concentration > 5.0, will be sealed by grouting over the entire length of the mineralization zone and not less than 10 metres above or below each mineralization zone. The top 30 metres of the hole within bedrock will also be sealed by grouting once drilling is complete.”

The new Radiation Hazard Control Plan under section 7.2 drilling states that “For information on drill hole grouting requirements, please refer to Generation Uranium’s Abandonment and Restoration Plan.” However, the Abandonment and Restoration plan does not state the above information within its plan. CIRNAC requests that the information about how drill hole grouting be re-added in.