

INTERVENTION RE:  
CAMECO'S APPLICATION FOR RENEWAL OF THE BEAVERLODGE MINE/MILL SITE  
FACILITY OPERATING LICENSE RE: CMD 09-H2 FOR JANUARY 14, 2009

56 YEARS AND COUNTING

Yes, since 1952 when Beaverlodge uranium and mining facilities commenced operation, there has been 56 years of chemical and radioactive contamination released into the environment. According to the assessment by the CNSC Staff it will take approximately six decades before radium 226 "attenuates below the provincial surface water quality objective." (CMD 09-H2, p.6) Furthermore, "Results confirm past concerns regarding adverse aquatic effects and the slow rate of natural recover which will take 100 years or more." (CMD 09-H2, p. 6) According to today's best understanding, simple mathematics indicates that radium 226 will be released into the environment for 116 years and adverse aquatic effects will be present for 156 years. Yes indeed, 56 years and counting by tens of decades! And as we keep improving our environmental protection standards for legacy sites we will likely find other dangerous consequences.

The litany of concerns listed by CNSC include Cameco's failure to provide a radiological risk analysis to non-human biota, radiological risk analysis to humans, and its failure to undertake and submit "A Risk Reduction Options Analysis." To add insult to negligence, "Cameco has initiated a detailed third party review."(CMD 09-H2, p.7) Does this mean they are challenging the analysis by CNSC Staff? Is their next move to lobby the government to create another affair like Chalk River? After all Cameco does not want to be saddled with maintaining the site well into the next century. What would Cameco's investors do with their money?

CNSC staff should be commended on its forthright analysis. However, the analysis still begs several questions. Now that Saskatchewan has developed an Institutional Control Management Framework, why not fast track the project and give the site back to the province and to northern residents? Beaverlodge points to the dangerous realities of decommissioning and that it is not something that can be simply sloughed off to Saskatchewan citizens when it was originally a Federal decision to provide uranium for the USA nuclear bomb program that placed us in this untenable predicament.

How have we arrived at such a horrendous situation of decades of continuing radioactive pollution of the environment around Beaverlodge? Clearly the sloppy management of the Beaverlodge site should have never happened. Given the unacceptable consequences of radiological contamination of the environment how was it possible over the years for intelligent rational persons to continually approve careless Beaverlodge operations? Given the sheer negligence both by agencies, government regulators or private business, then they must be held accountable for the results of their negligence.

I am concerned that we may not learn any lessons from the Beaverlodge uranium operation. Undoubtedly there have been some well-intentioned regulatory officials making decisions about the mine until as late as 1981 when mining and milling ceased. Well, as the saying goes, "the road to hell is paved with good intentions." The problem was and may continue to be that good intentions were skewed with militaristic and political motives, economic greed and limited understanding, whether intentional or unintentional, of the dangers of uranium

mining and milling. The issue is that “limited understanding” means acting in ignorance which is morally unacceptable especially when it comes to nuclear activities, risk benefit analysis notwithstanding. The Philosopher, Hans Jonas makes the point quite clearly in his book, *The Imperative of Responsibility*, The University of Chicago Press, Chicago & London, 1983.

We can also ask, how would the Canadian public and Saskatchewan citizens react if there is real transparency about what is taking place at Beaverlodge? Oh yes, it was announced that Cameco’s license is up for renewal. How many people have actually received and read copies of CMD 09-H2? One can only note with cynicism past Commission decision releases which state that there was no public input or that public comments were noted but, in effect, basically brushed aside. CNSC Staff should be required to release public statements geared to inform citizens with the full details of their analysis and to send these to Members of Parliament and Members of Provincial Legislatures. Experience shows that citizens in general and politicians in particular are for the most part completely in the dark and become susceptible to propaganda and lobbying from the nuclear industry. Of course this would likely undermine the nuclear industry’s credibility if a wide audience should come to know that nuclear is not clean, safe or reliable.

It is quite clear that there is an effort to eliminate public participation in environmental issues. Early and continuing public participation is essential to preserve democracy and provide governments and its agencies with sober second thoughts. Essential to a healthy democracy, lest we forget, is that citizens need to be able to identify with regulations and decisions that impact their lives and their families.

I am writing this because I am one of thousands of citizens and counting who are seriously concerned about what has happened and due diligence must be exercised and responsibility properly allocated in the decommissioning of Beaverlodge. On its own, non-reversible pollution from the nuclear chain is a disaster and utter madness as evident at Beaverlodge. With nuclear pollution coupled with other polluting emissions such as tar sands extraction what future is being offered to our children?

As a Commission, a lot is riding on your shoulders. It is not clear what level of personal accountability each member of the commission has for your decisions as a Commission. If each member were to be held personally accountable would your decisions be the same as those you are making? One can only pray that you have the objectivity and wisdom to make the right decisions other wise the environment and our offspring will pay the consequences for “several generations and counting!”

Jim Penna, Ph.D.  
Retired Professor of Philosophy  
706 28<sup>th</sup> Street West  
Saskatoon, SK.  
S7L 0L4  
[penna.jim@usask.ca](mailto:penna.jim@usask.ca)  
306-373-0309

SUPPLEMENTARY TO : CMD 09-H2.6

CONCERNING:

CAMECO'S APPLICATION FOR RENEWAL OF THE BEAVERLODGE MINE/MILL SITE  
FACILITY OPERATING LICENSE RE: CNSC: CMD 09-H2.1B and CMD 09-H2.C FOR  
NOVEMBER 7<sup>TH</sup>, 2009

J. V. PENNA, PH.D.

Here is my supplementary response to Cameco's submission to CNSC: CMD 09-H2.1B and to CNSC recommendations: CMD 09-H2.C . I also wish to make an oral presentation in the afternoon.

Cameco and its predecessor Eldorado were licensed in the past to mine uranium at the Beaverlodge site which resulted in pollution and irreparable contamination. Even though northerners were not previously informed or consulted about the prospects and consequences of mining uranium in their area, Cameco is now seeking a license based upon their intention to invite affected communities to help deal with the mess Eldorado/Cameco created. Apparently it is Cameco's intention to post warning signs, conduct workshops, have consultations, create monitoring jobs and involve northerners in a "detailed plan '... which will be revised periodically.'" Just how detailed can a plan be if it needs to be revised periodically? Is there really a plan?

This so-called plan based upon little if any actual decontamination work and consisting mostly of a lot of talk and warnings does not augur well for the safe restoration of the environment and the safety of the affected areas. Does Cameco really know what it is doing ? Nevertheless, CNSC Staff are recommending that CNSC should be granting a license which will allow Cameco with the co-operation of affected northerners to prepare the Beaverlodge site to be returned to the responsibility of the Province of Saskatchewan under the Institutional Control Management Framework which evidently is the whole point of this exercise as far as Cameco is concerned!

However, will this result in mitigating the predicted "Radium concentrations, in the Fulton Creek tailings system, [which] are expected to increase for 20 to 30 years and [which will} then gradually decrease towards water quality objectives in the long term [?]" What does long term mean? Since "Hydrochemical models indicate that it will be decades to a century before water and sediment levels will decline to natural background level ," will the Province of Saskatchewan be left with the

responsibility for posting warning signs , conducting workshops, consultations and providing monitoring jobs for northerners in a detailed plan of action which may be revised periodically?

Two other questions must be asked. On page 4 of CMD 09-H2.C , when the CNSC staff met with the Metis-Saskatchewan officials to discuss differences in approaches to issues at legacy mines compared to current or modern uranium mines, did they explain to MN-S officials the details of the sloughing of sand, molybdenum & selenium contamination as far as 10 km downstream from the Key Lake tailings site to Delta Lake, the clogged drainage pipes, crumbling tailings management facilities walls and the need to recycle tailings and rebuild “state of the art” tailing management facilities at Key Lake? If modern approaches are failing what hope is there to mitigate the problems created by the wanton negligence at legacy mines such as Beaverlodge?

The second question that must be asked concerns Appendix 2, “Beaverlodge remedial Options Summary Table”. Despite the intention to ‘remediate drill hole seeps’, ‘Seal mine openings –by plugging flowing drill holes ‘and again ‘seal mine openings cover’ or ‘vegetate’ in several instances there are no significant remedial actions noted. In fact ‘leave-as-is’ is considered one of the remedial options.

In the context of legacy mines ‘leave-as-is’ can only mean either that nothing can be done or that to do anything would be to make a bad situation even worse or that there is no will to do anything? Cameco finding itself in a self inflicted impossible situation proposes to place the burden upon the affected communities under the guise of workshops and consultations - after the fact ! – with the prospect of providing monitoring jobs. In fact, this appears to be nothing but a policy of recruitment for guardians of contaminated land and waters and for making the victims responsible for the victimization by Eldorado\Cameco. This does not bode well for the health of northerners and for any future diversified business prospects for northern development especially since uranium exploitation of the north continues under even more relaxed regulations that speed up the licensing process of uranium mines. Will northerners be left simply with the task of being guardians of nuclear mining and milling waste and contamination?

In conclusion, given the lack of technical viable measures to deal effectively with the dangerous levels of contamination at the Beaverlodge site, Cameco must be held legally and financially responsible for the full negative impact on the environment and on all the residents by this contaminating legacy

mining site. Furthermore, Cameco must be required to engage trustworthy competent experts who are at arms length from Cameco's own staff and who will develop a realistic and practical plan that will deal with all the contamination problems. Finally, if Cameco fails to deal with the problems at Beaverlodge, Cameco should be deemed to be a hostile corporation and have all its licenses revoked and its assets seized to pay for environmental and health damages. If a medical doctor is found to be both professionally negligent and the reason for continuing harm to patients, such a doctor would immediately be suspended and have his/her license revoked. Why should it be any different for Corporations which are negligent and whose actions continue to cause irreparable harm?

To you the members of the Commission, the Commission's credibility is on the line. How you deal with Beaverlodge will demonstrate loud and clear how seriously you live up to the word "safety" in your title as the Canadian Nuclear **Safety** Commission.

J. V. Penna, Ph.D.

Saskatoon, SK

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