

Comments from CNSC on Revised Draft EIS Guidelines for Kiggavik

Comment #	Page	Section	Paragraph	Comment (include "clear rationale of importance to EA")	Suggested Text
1	7	2.5	1st	Clarity of language - was casual or causal intended?	Change "casual" to "causal", if intended.
2	12	4.4	bullet 9	Editorial comment.	change "where" to " <b>were</b> "
3	17	5.4.2	3rd	Clarity of language First sentence could be better placed in later section describing baseline.	Remove "The description of the existing baseline..." (and ensure content covered in 7.1) so para starts with "As is the case for the determination of spatial..."
4	17	5.4.2	4th	Editorial comment.	"... which might <b>influence some</b> of the impact..."
5	17	5.4.2	4th	Clarity of language Term "global warming" is misleading - "climate change" is more accurate. Recommend using "climate change" rather than "global warming" or "global climate change".	Suggest retaining the phrase "climate change" and deleting content in parentheses. Or replace with either "(including warming or cooling trends) or just remove global. As a minor note, could remove word "global" elsewhere in document where "global climate change" is referenced (e.g. pages 19, 45, 46).
6	17	5.5	1st	Editorial comment.	Replace "..., to include Crown land..." with ", <b>including</b> Crown..."
7	17-18	5.6	bullets 4 and 6	4th bullet (community support) and 6th bullet (financing) may be more appropriate in other sections rather than Analysis of Need and Purpose.	Could move 4th and 6th bullet to Section 7.4 Public Consultation and Section 5.1 Proponent Information, respectively.
8	19-20	6.2	bullets	Editorial comments.	2nd bullet - change "...and it must describe..." to " <b>...that must describe...</b> " 3rd bullet - could say "... on impact assessment" 6th bullet - change to " <b>...project components. Special...</b> "
9	23	6.6.1.2	bullet 8	Editorial comment.	Recommend replacing "provide" with " <b>provision of</b> "
10	23	6.6.1.2	bullet 9	Editorial comment.	"by taking into <b>consideration the</b> predicted..."
11	24	6.6.1.3	bullet 3	Editorial comment.	"... disposing waste <b>rock</b> into the... thawing of <b>the permafrost</b> is ...".
12	31	6.6.5	bullet 11 sub-bullet 1	Clarity of language	Consider rewording "beset" to <b>surrounded</b> or <b>trapped</b>
13	34	6.6.10	sub bullet 5	Editorial comment.	"to be <b>used</b> "

14	35	6.6.10	sub bullet 6	Editorial comment.	"due to tailings <b>disposal</b> "
15	35	6.6.10	sub bullet 8, 9, elsewhere	Editorial comment - multiple references	Replace references to tailing management facility (or facilities) with <b>tailings management facilities</b>
16	41	7.5	2nd	Editorial comment.	change to "... indicate whether special efforts <b>were</b> made..."
17	45	7.11	2nd	Clarity of language	Recommend reword "ascertain" to "determine"
18	48	8.1.1.2	bullet 1	Editorial comment CO2 will be captured by the reference to GHG emissions but CO should also be included - recommend replacing CO2 with CO. Also, consider adding HCl, because of the presence of chlorinated compounds in the items burned in the incinerator.	Reword as: "Assessment of effects on air quality from Project emissions during various Project stages; including radon-222, airborne dust (total suspended particulates (TSP), PM10 and PM2.5, radioactive constituents, and/or metals), GHG emissions, <b>HCl</b> , and standard air contaminants such as sulphur dioxide (SO2), nitrogen oxides (NOx), carbon <b>monoxide (CO)</b> , ozone (O3) etc."
19	52	8.1.6.1	bullet 1 and bullet 4	Editorial comments.	Insert comma after physical "Description of the <b>geotechnical</b> ..."
20	53	8.1.7.1	bullet 7	Editorial comment.	Remove "should be presented" (not needed)
21	56	8.1.10.1	bullet 2	Editorial comment.	" <b>benthic invertebrates</b> "
22	58	8.1.11.2	bullet 5, bullet 7, bullet 8	Editorial comments.	bullet 5: consider replacing Inuit with <b>northerners</b> , as was done for bullet 6 of 8.1.11.1 bullet 7: suggest removing "quality" (as quantity is also of interest) bullet 8: replace with <b>Labrador</b> tea. Also "... especially taken <b>into</b> consideration..."
23	60	8.1.12.2	last bullet	Editorial comment.	"... for example, consideration of"
24	63	8.2	1st	Clarity of language First and second sentences duplicative - baseline in first sentence implies conditions	Recommend deleting second sentence. (Intro to third sentence may then need rework).
25	67	8.2.5.2	bullet 2, bullet 7	Editorial comments. (For bullet 2 - future tense is implied.)	bullet 2: Delete "ed" from develop. bullet 7: Insert "and" in place of comma
26	69	8.2.7.2	bullet 3, last bullet	Editorial comments.	bullet 3: Replace with "Assessment of project-related procurement, and potential capacity to meet Project needs" last bullet: Delete "ed" from develop

27	70	8.2.10.1	bullet 2	Clarity of language	Recommend either "... of the Proponent's understanding <b>of</b> the role of <b>governments in</b> the process of ..." or "... of the Proponent's understanding of the roles <b>that</b> governments play in the process..."
28	71	8.2.10.2	bullet 1	Clarity of language	Reword as "... planning meets the needs of ... <b>plans</b> "
29	74	8.4	last para	Editorial comment.	"... fire and explosion incidents..."
30	76	9.3	bullet 5	Clarity of language	Reword to "Description of measures taken to protect the monitoring infrastructure from climate change and potential major climate events (e.g. extreme flows)"
31	78	9.4.3	bullet 1	Clarity of language Duplicates (for the most part) the content in 8.1.1.2 (p. 48). Could just reference previous list. Alternatively, could duplicate list.	Recommend deleting list and rewriting bullet as: "Description of proposed air quality monitoring and related adaptive management measures for emissions related to the Project <b>as described in Subsection 8.1.1.2</b> , including thresholds for action and mitigation strategies;"
32	80	9.4.8	bullet 2	Clarity of language.	Change physiochemical to <b>physicochemical</b> . Consider using same word on p. 19 (6.1, 1st para) and elsewhere.
33	85	9.4.18	1st	Editorial comment.	change access road to access <b>roads</b>
34	86	9.5.1	bullet 1	Editorial comment.	"... occupational health and safety program...." (should be singular)
35	87	9.5.1	bullet 2	Editorial comment.	change Details to <b>details</b>
36	General			Editorial comment.	Replace references to uranium concentrates with <b>uranium concentrate</b> (p. 32x2). (Either phrase is fine, but text should be consistent).

37	General			Editorial comment.	<p>CNSC recommends the removal of all references to special waste [rock] and clean waste [rock] in the Guidelines, including the glossary, and replacing the former with "waste rock" (or similar wording that conveys the concept of rock that must be managed). The existing phrases can be confusing for a public audience and/or those unfamiliar with the nuclear industry and the phrases are contradictory (e.g. clean waste rock).</p> <p>For a definition of waste rock, you could use Environment Canada's Code of Practice for Metal Mines, p. 79: <a href="http://www.ec.gc.ca/lcpe-cepa/documents/codes/mm/mm-eng.pdf">http://www.ec.gc.ca/lcpe-cepa/documents/codes/mm/mm-eng.pdf</a>. CNSC also has a short description at: <a href="http://www.nuclearsafety.gc.ca/eng/mediacentre/updates/uranium_mining.cfm#9">http://www.nuclearsafety.gc.ca/eng/mediacentre/updates/uranium_mining.cfm#9</a></p> <p>Note: It will be up to AREVA to provide the definitions of the categories of rock to be removed from the mine. (This is from 3(b)(iii) of the Uranium Mines and Mills Regulations - <a href="http://laws.justice.gc.ca/eng/sor-2000-206/FullText.html">http://laws.justice.gc.ca/eng/sor-2000-206/FullText.html</a>).</p>
----	---------	--	--	--------------------	---