

**RAI 25:**

Description of Deficiency: The applicant did not show integration between construction and plant management as part of the organizational structure.

Basis for Request: NUREG-1569, Acceptance Criterion 5.1.3(2), states that the organization structure should show integration among groups that support the operation and maintenance of the facility, and if the facility is new, the integration between plant construction and plant management should be detailed. Although there will be construction of a new satellite facility and well fields, the applicant did not describe the integration between plant construction and plant management.

Request for Additional Information: Please describe in the text or include in the organizational charts how construction will interface with plant management or indicate where this information can be found.

**RAI Response 25 (03/16/15):**

Section 5.1.10 has been revised to provide an outline of Cameco's contractor management program.



3. Reporting promptly, to immediate supervisor, any malfunction of equipment or violation of procedures which could result in an unacceptable increased radiological hazard
4. Properly using protective equipment
5. Properly performing required contamination surveys

### 5.1.10 SubContractor Management

Like the CPF, CBR will employ subcontractors to accomplish a variety of tasks at the MEA starting with facility construction and continuing into operations. CBR subcontractor interactions are governed by the Cameco -Resources SHEQ Management System, Contractor Management Program, Document Number CR-CMP. The CMP describes the requirement for managing both long term and short term contractors, including subcontractors at all CBR work sites. The purpose of the contractor management program is to insure a consistent approach to managing contractor activities. The major elements of the at-program include:

- Development of a Scope of Work that identifies and addresses Safety, Radiation, Environmental, and Quality objectives
- Cameco review of required subcontractor submissions
- Establishment and control of site access
- Training
- Job Hazard Analyses where appropriate
- Communication with the subcontractor
- Documentation
- Change Control
- Emergency preparedness and response
- Roles and responsibilities
- Supervision and Oversight of Contractor Performance
  - o Graded approach
  - o Inspections and audits
  - o Tracking
  - o Non-conformances and corrective actions
- Management reviews

The overall objectives of this program are to insure that:

- People and the environment are protected;
- SHEQ risks associated with contractor activities are managed in a risk-informed manner;
- Contractor's work in accordance with Cameco's SHEQ Policy, CBR's integrated SHEQ management system and applicable regulatory requirements; and
- CBR is duly diligent with respect to contractor management.