

**ATTACHMENT 11**

DRAFT 10/4/2012

A proposal for completing Section 106 for the four Cameco ISR properties:

One of our primary concerns, from the beginning of this effort, has been to ensure that places within our license area that are significant to the tribes of the region be identified so that we can, to the extent possible, protect them from disturbance during project activities. We still would like to achieve that goal, even though formal efforts to contract with the tribes to carry out identification efforts have so far been unsuccessful. As an alternative approach, we would propose the following:

If any of the tribes with ancestral ties to the Crow Butte license renewal area, the Three Crow Expansion Area, the Marsland Expansion Area, and the North Trend Expansion Area (see attached map) would be interested in working with us, we are willing to open those areas to tribal visitation and to provide funding to support such visitation during the month of November 2012.

Specifically Cameco proposes:

- Pre-arranged visitation by tribal members or tribal employees designated by each tribal government will be available anytime from Thursday November 1<sup>st</sup> through Friday November 16, 2012, during daylight hours.
- Cameco will provide \$125 per day per diem for up to (two? three?) individuals from each tribe, mileage at 55¢ per mile for one mobilization from the tribal headquarters to Chadron, Nebraska, and back, as well as mileage for daily round-trips from Chadron to the project areas and back
- Cameco will also provide an unconditional grant of \$5,000 to each tribe choosing to participate in the site visits to help defray other costs that the tribe may incur in order to participate in this program.
- Each visitor will be provided a safety briefing and will be asked to sign a release of liability in Cameco's favor.
- If more than three field days are lost due to rain or snow, an additional five days will become available during the last week of November, with payment of per diem and mileage for another mobilization.
- Cameco encourages the tribes to combine efforts if possible to facilitate scheduling and access.
- Cameco representatives will escort tribal representatives to the project areas and will remain in the vicinity, but will not directly accompany the tribes during their examination of whatever areas they choose to visit.

Possible outcomes of the proposed site visits:

1. Tribes who choose not to reveal the locations of any sensitive areas within the four license areas but who wish to participate in the site visits program are welcome to do so.
2. Tribal representatives who encounter potentially sensitive sites or features during the site visit may, if they wish, ask the Cameco representative to use a GPS unit to record the general boundaries of any sites or features that they would like Cameco to avoid disturbing if possible. Cameco would provide this information to NRC and indicate whether the features or sites can be avoided during construction, operation, and reclamation of the license area and how they would ensure such avoidance.

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3. Alternatively, tribal representatives may bring their own GPS units for use during the site visit and then provide NRC with the coordinates of the boundaries of any features or sites where avoidance is requested by December 15, 2012. NRC will then coordinate with Cameco to determine whether the features or sites can be avoided and what measures should be taken to ensure such avoidance.

For identified sites and features that can be avoided, there will be no need for the tribes to disclose any information about the nature and significance of these places or about the meaning that these places have for the tribes. Cameco will commit to avoiding any sites or features of religious and cultural significance identified by the tribal representatives during the site visits to the maximum extent feasible, without reference to National Register of Historic Places eligibility. NRC will ensure that such avoidance is made a condition of the license renewal or expansion.

For any identified sites or features of religious and cultural significance that cannot be avoided, NRC will work with the participating tribes, the Nebraska State Historic Preservation Officer, and Cameco to develop a plan for formal recordation and National Register evaluation of these identified places of religious and cultural significance. NRC will ensure that this plan, along with provisions for discussion of measures to resolve any adverse effects on eligible properties are included in the terms of a Section 106 Programmatic Agreement for the license renewal or expansion area in question.