

Appendix A

Wheeler River Project Completeness Check: Review of Denison Responses to Information Requests (IRs) and Supporting Documents Received July 14, 2023

Reference #	Status	Rationale	Context and Information Required for a Complete Response
Reference #: IR-1	Complete: Yes		
Reference #: IR-2	Complete: Yes		<p>Advice to the proponent: The response notes that: "A list of commitments, including specific commitment or mitigation measures related to Project effects as an outcome of engagement, made in the draft EIS, throughout the Federal information request period and the Provincial comment response period, will be included with the submission of the final EIS. For clarity, this would not include any private, confidential accommodations made under contractual agreements."</p> <p>CNSC staff expect that a draft commitments report be provided in a submission for staff to review during the technical review process. It is not sufficient to provide this at the final EIS step. CNSC staff recommend that Denison provide a draft commitments report along with the next submission. If this is not provided along with the revised responses to incomplete IRs, it will be expected at a later phase of the technical review process, as this IR cannot be resolved until the draft report has been received.</p>
Reference #: IR-3	Complete: Yes		
Reference #: IR-4	Complete: Yes		
Reference #: IR-5	Complete: Yes		
Reference #: IR-6	Complete: Yes		
Reference #: IR-7	Complete: Yes		
Reference #: IR-8	Complete: Yes		
Reference #: IR-9	Complete: Yes		
Reference #: IR-10	Complete: Yes		
Reference #: IR-11	Complete: Yes		
Reference #: IR-12	Complete: Yes		
Reference #: IR-13	Complete: Yes		<p>Advice to the proponent: The Final EIS Updates column highlights the following change to EIS text: "Based on the current wellfield and freeze wall design, approximately 150 2,000 m3 of special waste rock will be generated." This change appears unrelated to the IR response, and it is unclear why the size has increased from 150 to 2000 m3.</p> <p>CNSC staff expect that none of the information that has been previously provided in the draft EIS, currently under technical review, will change unless the revisions are the result of an IR. Further, any revisions to draft EIS text must be reviewed before a final EIS can be provided. No new information can be provided in the Final EIS.</p>
Reference #: IR-14	Complete: Yes		
Reference #: IR-15	Complete: Yes		

Reference #	Status	Rationale	Context and Information Required for a Complete Response
Reference #: IR-16	Complete: Yes		Advice to the proponent: The meeting held with CNSC staff and Denison on December 7 th , 2022 was with a specialist from the Health Sciences and Environmental Compliance Division (HSECD) and not the ERA lead. Please edit this for clarity.
Reference #: IR-17	Complete: Yes		Advice to the proponent: The fourth paragraph of the response appears to be missing an end quote. Please add this for clarity.
Reference #: IR-18	Complete: Yes		
Reference #: IR-19	Complete: Yes		
Reference #: IR-20	Complete: Yes		
Reference #: IR-21	Complete: Yes		
Reference #: IR-22	Complete: Yes		
Reference #: IR-23	Complete: Yes		
Reference #: IR-24	Complete: Yes		
Reference #: IR-25	Complete: Yes		
Reference #: IR-26	Complete: Yes		
Reference #: IR-27	Complete: Yes		
Reference #: IR-28	Complete: Yes		
Reference #: IR-29	Complete: Yes		
Reference #: IR-30	Complete: Yes		
Reference #: IR-31	Complete: Yes		
Reference #: IR-32	Complete: Yes		
Reference #: IR-33	Complete: Yes		
Reference #: IR-34	Complete: Yes		
Reference #: IR-35	Complete: Yes		
Reference #: IR-36	Complete: Yes		

Reference #	Status	Rationale	Context and Information Required for a Complete Response
Reference #: IR-37	Complete: Yes		
Reference #: IR-38	Complete: Yes		
Reference #: IR-39	Complete: Yes		
Reference #: IR-40	Complete: Yes		
Reference #: IR-41	Complete: Yes		
Reference #: IR-42	Complete: Yes		
Reference #: IR-43	Complete: Yes		
Reference #: IR-44	Complete: No	<p>Rationale: The information provided is insufficient to allow a technical review.</p>	<p>Context and Information Required for a Complete Response: The response does not provide details of the noise complaints resolution and response procedure as per Health Canada (2017).</p> <p>As noted in section 9.3 of the CNSC’s Generic EIS Guidelines, the EIS will “describe mitigation measures that are specific to each environmental effect identified. Measures will be written as specific commitments that clearly describe how the proponent intends to implement them and the environmental outcome the mitigation is designed to address”.</p> <p>A response that the requested information will be provided as part of the licensing efforts is not a sufficient response. Although a fully detailed monitoring and follow-up plan is not required at this stage, the information in the draft EIS lacked the level of detail required in order for the reviewer to complete their technical review.</p> <p>Please provide a complete response with sufficient detail for reviewers to complete their review.</p>
Reference #: IR-45	Complete: Yes		
Reference #: IR-46	Complete: Yes		
Reference #: IR-47	Complete: Yes		
Reference #: IR-48	Complete: Yes		
Reference #: IR-49	Complete: Yes		
Reference #: IR-50	Complete: Yes		
Reference #: IR-51	Complete: Yes		
Reference #: IR-52	Complete: Yes		
Reference #: IR-53	Complete: Yes		

Reference #	Status	Rationale	Context and Information Required for a Complete Response
Reference #: IR-54	Complete: Yes		
Reference #: IR-55	Complete: Yes		
Reference #: IR-56	Complete: Yes		
Reference #: IR-57	Complete: Yes		
Reference #: IR-58	Complete: Yes		
Reference #: IR-59	Complete: Yes		
Reference #: IR-60	Complete: Yes		
Reference #: IR-61	Complete: Yes		
Reference #: IR-62	Complete: Yes		
Reference #: IR-63	Complete: Yes		
Reference #: IR-64	Complete: Yes		
Reference #: IR-65	Complete: Yes		
Reference #: IR-66	Complete: Yes		
Reference #: IR-67	Complete: Yes		
Reference #: IR-68	Complete: Yes		
Reference #: IR-69	Complete: Yes		
Reference #: IR-70	Complete: Yes		
Reference #: IR-71	Complete: Yes		
Reference #: IR-72	Complete: Yes		
Reference #: IR-73	Complete: Yes		
Reference #: IR-74	Complete: Yes		

Reference #	Status	Rationale	Context and Information Required for a Complete Response
Reference #: IR-75	Complete: Yes		
Reference #: IR-76	Complete: Yes		
Reference #: IR-77	Complete: Yes		
Reference #: IR-78	Complete: Yes		
Reference #: IR-79	Complete: Yes		
Reference #: IR-80	Complete: Yes		
Reference #: IR-81	Complete: Yes		
Reference #: IR-82	Complete: Yes		
Reference #: IR-83	Complete: Yes		
Reference #: IR-84	Complete: Yes		
Reference #: IR-85	Complete: Yes		
Reference #: IR-86	Complete: Yes		
Reference #: IR-87	Complete: Yes		
Reference #: IR-88	Complete: Yes		
Reference #: IR-89	Complete: Yes		
Reference #: IR-90	Complete: Yes		
Reference #: IR-91	Complete: Yes		
Reference #: IR-92	Complete: Yes		
Reference #: IR-93	Complete: Yes		
Reference #: IR-94	Complete: Yes		
Reference #: IR-95	Complete: Yes		

Reference #	Status	Rationale	Context and Information Required for a Complete Response
Reference #: IR-96	Complete: Yes		
Reference #: IR-97	Complete: Yes		
Reference #: IR-98	Complete: Yes		
Reference #: IR-99	Complete: Yes		
Reference #: IR-100	Complete: Yes		
Reference #: IR-101	Complete: No	<p>Rationale: The response does not fully address each sub-question of the IR.</p>	<p>Context and Information Required for a Complete Response: The response to this IR does not provide the requested baseline information on wetland surface water and sediment quality characterization for wetlands within the Project footprint.</p> <p>A response that the requested information has not been collected to date is not a sufficient response. If information cannot be provided at this time, please justify in the response why this information is lacking, the path forward to resolving this gap, etc. As noted in section 8.4 of CNSC’s Generic EIS Guidelines, “The applicant or licensee should include an assessment of any limitations or gaps in the quality and extent of baseline data and methods, as well as the method(s) by which they have been addressed.”</p> <p>Please provide a complete response with sufficient detail for reviewers to complete their review.</p>
Reference #: IR-102	Complete: Yes		
Reference #: IR-103	Complete: Yes		
Reference #: IR-104	Complete: Yes		
Reference #: IR-105	Complete: Yes		
Reference #: IR-106	Complete: Yes		
Reference #: IR-107	Complete: Yes		
Reference #: IR-108	Complete: No	<p>Rationale: The information provided is insufficient to allow a technical review.</p>	<p>Context and Information Required for a Complete Response: Although these tables have been updated in the submission, they appear incomplete and it is not clear what the highlighted cells mean, nor why there are blank cells. This should be clear to the reviewer, and a reader of the EIS.</p> <p>Please update the tables appropriately, and where information is not provided, please provide a legend or explanation that helps a reader understand why certain information may have been omitted.</p>
Reference #: IR-109	Complete: Yes		
Reference #: IR-110	Complete: Yes		
Reference #: IR-111	Complete: Yes		

Reference #	Status	Rationale	Context and Information Required for a Complete Response
Reference #: IR-112	Complete: Yes		
Reference #: IR-113	Complete: Yes		
Reference #: IR-114	Complete: Yes		
Reference #: IR-115	Complete: Yes		
Reference #: IR-116	Complete: Yes		
Reference #: IR-117	Complete: Yes		
Reference #: IR-118	Complete: Yes		
Reference #: IR-119	Complete: Yes		
Reference #: IR-120	Complete: Yes		
Reference #: IR-121	Complete: Yes		
Reference #: IR-122	Complete: Yes		
Reference #: IR-123	Complete: No	<p>Rationale: The information provided is insufficient to allow a technical review.</p>	<p>Context and Information Required for a Complete Response: The response to this IR does not provide the baseline concentrations of mercury in sediment.</p> <p>A response that the requested information has not been collected to date is not a sufficient response. If information cannot be provided at this time, please justify in the response why this information is lacking, the path forward to resolving this gap, etc. As noted in section 8.4 of CNSC's Generic EIS Guidelines, "The applicant or licensee should include an assessment of any limitations or gaps in the quality and extent of baseline data and methods, as well as the method(s) by which they have been addressed."</p> <p>Please provide a complete response with sufficient detail for reviewers to complete their review.</p>
Reference #: IR-124	Complete: Yes		
Reference #: IR-125	Complete: Yes		
Reference #: IR-126	Complete: Yes		
Reference #: IR-127	Complete: Yes		
Reference #: IR-128	Complete: Yes		
Reference #: IR-129	Complete: Yes		

Reference #	Status	Rationale	Context and Information Required for a Complete Response
Reference #: IR-130	Complete: Yes		
Reference #: IR-131	Complete: Yes		
Reference #: IR-132	Complete: Yes		
Reference #: IR-133	Complete: Yes		
Reference #: IR-134	Complete: Yes		
Reference #: IR-135	Complete: No	<p>Rationale: The response does not fully address each sub-question of the IR.</p>	<p>Context and Information Required for a Complete Response: The response does not provide details on noise and other sensory disturbance monitoring and mitigations if noise levels surpass thresholds. The response also makes reference to Section 6.2.5 and 6.2.8, which Denison considers an appropriate level of supplemental information to support the IR.</p> <p>While the draft EIS broadly discusses mitigation measures and monitoring and follow-up activities, the information in section 9 lacked the level of detail required in order for the reviewer to complete their technical review. Further, it is expected that responses to IRs be self-contained, which means that the response itself should summarize the key elements of this information and demonstrate how the information fully address the IR, as opposed to reviewers having to look and identify which information is relevant to their question.</p> <p>Please provide a complete response with sufficient detail for reviewers to complete their review.</p>
Reference #: IR-136	Complete: Yes		
Reference #: IR-137	Complete: Yes		
Reference #: IR-138	Complete: Yes		
Reference #: IR-139	Complete: Yes		
Reference #: IR-140	Complete: Yes		
Reference #: IR-141	Complete: Yes		
Reference #: IR-142	Complete: Yes		
Reference #: IR-143	Complete: Yes		
Reference #: IR-144	Complete: Yes		
Reference #: IR-145	Complete: Yes		
Reference #: IR-146	Complete: Yes		
Reference #: IR-147	Complete: No	<p>Rationale: The response does not fully address each sub-question of the IR.</p>	<p>Context and Information Required for a Complete Response: The response lacks sufficient details regarding reclamation activities and measures. As noted in the original IR, the information currently provided in the EIS (the conceptual decommissioning plan) is insufficient for the Federal-Indigenous Review Team to assess project impacts.</p>

Reference #	Status	Rationale	Context and Information Required for a Complete Response
			Please provide a complete response with sufficient detail for reviewers to complete their review, and any supporting documentation to support this request.
Reference #: IR-148	Complete: Yes		
Reference #: IR-149	Complete: Yes		
Reference #: IR-150	Complete: Yes		Advice to the Proponent: Although this response is complete for the purposes of moving to the next phase of technical review, it would be valuable reviewers to have the original reference that underpins this response. If available, please provide the 2021/2022 Caribou Trail study along with the submission of updated responses to the outstanding IRs.
Reference #: IR-151	Complete: Yes		
Reference #: IR-152	Complete: Yes		
Reference #: IR-153	Complete: Yes		
Reference #: IR-154	Complete: Yes		
Reference #: IR-155	Complete: Yes		
Reference #: IR-156	Complete: Yes		
Reference #: IR-157	Complete: Yes		
Reference #: IR-158	Complete: Yes		
Reference #: IR-159	Complete: Yes		
Reference #: IR-160	Complete: Yes		
Reference #: IR-161	Complete: Yes		
Reference #: IR-162	Complete: Yes		
Reference #: IR-163	Complete: Yes		
Reference #: IR-164	Complete: Yes		
Reference #: IR-165	Complete: Yes		
Reference #: IR-166	Complete: Yes		

Reference #	Status	Rationale	Context and Information Required for a Complete Response
Reference #: IR-167	Complete: Yes		
Reference #: IR-168	Complete: Yes		
Reference #: IR-169	Complete: Yes		
Reference #: IR-170	Complete: Yes		
Reference #: IR-171	Complete: Yes		
Reference #: IR-172	Complete: Yes		
Reference #: IR-173	Complete: No	<p>Rationale: The response does not fully address each sub-question of the IR.</p>	<p>Context and Information Required for a Complete Response: The response does not provide any details on monitoring and follow-up programs for avian mortality.</p> <p>While the draft EIS broadly discusses mitigation measures and monitoring and follow-up activities, the information in section 9 lacked the level of detail required in order for the reviewer to complete their technical review.</p> <p>Please provide a complete response with sufficient detail for reviewers to complete their review.</p>
Reference #: IR-174	Complete: Yes		
Reference #: IR-175	Complete: Yes		
Reference #: IR-176	Complete: Yes		
Reference #: IR-177	Complete: Yes		
Reference #: IR-178	Complete: Yes		
Reference #: IR-179	Complete: Yes		
Reference #: IR-180	Complete: Yes		
Reference #: IR-181	Complete: Yes		
Reference #: IR-182	Complete: Yes		
Reference #: IR-183	Complete: Yes		
Reference #: IR-184	Complete: Yes		
Reference #: IR-185	Complete: Yes		

Reference #	Status	Rationale	Context and Information Required for a Complete Response
Reference #: IR-186	Complete: Yes		
Reference #: IR-187	Complete: Yes		
Reference #: IR-188	Complete: Yes		
Reference #: IR-189	Complete: Yes		
Reference #: IR-190	Complete: Yes		
Reference #: IR-191	Complete: Yes		
Reference #: IR-192	Complete: Yes		
Reference #: IR-193	Complete: Yes		
Reference #: IR-194	Complete: Yes		
Reference #: IR-195	Complete: Yes		
Reference #: IR-196	Complete: Yes		
Reference #: IR-197	Complete: Yes		
Reference #: IR-198	Complete: Yes		
Reference #: IR-199	Complete: Yes		
Reference #: IR-200	Complete: Yes		
Reference #: IR-201	Complete: Yes		
Reference #: IR-202	Complete: Yes		
Reference #: IR-203	Complete: Yes		
Reference #: IR-204	Complete: Yes		
Reference #: IR-205	Complete: Yes		
Reference #: IR-206	Complete: Yes		

Reference #	Status	Rationale	Context and Information Required for a Complete Response
Reference #: IR-207	Complete: Yes		
Reference #: IR-208	Complete: Yes		
Reference #: IR-209	Complete: Yes		
Reference #: IR-210	Complete: Yes		
Reference #: IR-211	Complete: Yes		
Reference #: IR-212	Complete: Yes		
Reference #: IR-213	Complete: Yes		
Reference #: IR-214	Complete: No	<p>Rationale: The supplementary material or changes to EIS documents or TSDs provided as part of the response is/are insufficient to adequately meet the request.</p>	<p>Context and Information Required for a Complete Response: The response acknowledges that changes are required but does not provide proposed revisions to the draft text. The final EIS is our review step to verify that accepted responses to IRs and proposed revisions to the EIS and any supporting documentation have been accepted. The reviewer must review this information before IRs can be resolved, which is required prior to a final EIS submission.</p> <p>Please provide the proposed changes to the draft text for review by the FIRT in the appropriate sections.</p>
Reference #: IR-215	Complete: Yes		
Reference #: IR-216	Complete: Yes		
Reference #: IR-217	Complete: Yes		
Reference #: IR-218	Complete: Yes		
Reference #: IR-219	Complete: Yes		
Reference #: IR-220	Complete: Yes		
Reference #: IR-221	Complete: Yes		
Reference #: IR-222	Complete: Yes		
Reference #: IR-223	Complete: Yes		
Reference #: IR-224	Complete: Yes		
Reference #: IR-225	Complete: Yes		

Reference #	Status	Rationale	Context and Information Required for a Complete Response
Reference #: IR-226	Complete: Yes		
Reference #: IR-227	Complete: Yes		
Reference #: IR-228	Complete: No	Rationale: The information provided is insufficient to allow a technical review.	Context and Information Required for a Complete Response: The response does not provide the dose calculations for deriving the dose estimates for workers and members of the public for Bounding Scenario 6. As noted in Section 9.4.1 of CNSC’s Generic EIS Guidelines, “Malfunctions and accidents are reviewed in depth under the NSCA for licensing purposes (for example, under REGDOC-2.4.1, Deterministic Safety Analysis; REGDOC-2.4.2, Probabilistic Safety Assessments for Nuclear Power Plants and REGDOC-1.1.1, Site Evaluation and Site Preparation for New Reactor Facilities. These scenarios should be taken into consideration by the applicant when designing environmental protection measures.” Please provide a complete response with sufficient detail for reviewers to complete their review.
Reference #: IR-229	Complete: Yes		
Reference #: IR-230	Complete: Yes		
Reference #: IR-231	Complete: Yes		
Reference #: IR-232	Complete: Yes		
Reference #: IR-233	Complete: Yes		
Reference #: IR-234	Complete: Yes		
Reference #: IR-235	Complete: Yes		Advice to the Proponent: The response to sub-question #2 is not specified in the response. The response contains #1, 3 and 4. Although it appears that some of this text responds to #2, revise response in the submission of updated responses to the outstanding IRs.
Reference #: IR-236	Complete: Yes		
Reference #: IR-237	Complete: Yes		
Reference #: IR-238	Complete: Yes		