

Memorandum Memorializing Ex Parte Communication

To: [expartecommunications@hq.doe.gov](mailto:expartecommunications@hq.doe.gov) (sent via e-mail)

Summary

On March 31, 2011, a call was held between the Department of Energy and representatives from Cameco. The purpose of the call was to discuss DOE's Notice of Inquiry and request for comment to assist in its development of regulations pertaining to Section 934 of the Energy Independence and Security Act of 2007, as published in the Federal Register on July 27, 2010 (75 FR 43945). Section 934 addresses how the United States will meet its obligations under the Convention on Supplementary Compensation ("CSC") for Nuclear Damage, including its obligation to contribute to an international supplementary fund in the event of certain nuclear incidents. Section 934 authorized DOE to issue regulations establishing a retrospective risk pooling program by which nuclear suppliers will reimburse the United States government for its contributions to the international supplementary fund.

During the call, Cameco summarized its comments on the NOI, which were submitted on November 29, 2010. Cameco's position is that uranium miners and providers of conversion services are not "nuclear suppliers" and therefore should not be included in the risk pooling program. Cameco also explained that, if included in the definition, the miners/conversion services should be excluded from the retrospective pool. DOE asked several questions, including where in the fuel cycle, in our view, should the line be drawn for the pool and how should risks be allocated among suppliers.

Attendees

Paul Goranson (Cameco)  
James Dobchuk (Cameco)  
Tyson Smith (Winston & Strawn)  
Jon Indall (UPA)  
Sophia Angelini (DOE)  
Anita Capoferri (DOE)  
Ben McRae (DOE)  
Sean Tyson (DOE)

Respectfully submitted,

William Paul Goranson, P.E.  
President  
Cameco Resources