

BY EMAIL AND MAIL

February 28, 2014

Attn: Ms. Kirsten Walli, Board Secretary

Ontario Energy Board

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To Ms. Walli,

**Re: Ontario Power Generation, 2014/2015 Payment Amounts
Application, Board File Number: EB-2013-0321**

Please find attached Lake Ontario Waterkeeper's interrogatories in the above mentioned proceeding. We have made our submissions by email and will be sending two hard copies to the Board as well.

Thank you for your consideration. If you have any further questions or concerns, please contact our articling student Pippa Feinstein at articling@waterkeeper.ca, or call our office at 416 861 1237.

Sincerely,



Mark Mattson

President and Waterkeeper

Before the Ontario Energy Board

IN THE MATTER OF the Ontario Energy Board Act, 1998, S. O. 1998, c. 15, Schedule B;

AND IN THE MATTER OF an application by Ontario Power Generation Inc. pursuant to section 78.1 of the Ontario Energy Board Act, 1998 for an order or orders determining payment amounts for the output of certain of its generating facilities.

Lake Ontario Waterkeeper Interrogatories for Ontario Power Generation

Issues 4.9, 4.10, 6.7

Reference: Ex. D2-02-01 Darlington Refurbishment

1. Please provide a detailed budget of expenses related to the environmental studies and monitoring of the Darlington Nuclear Generating Station (DNGS) required by the Darlington Refurbishment Environmental Assessment (EA) and EA Follow-up Program. We request a budget for the test period, as well as one for the continued operation of the DNGS.
2. Please provide a detailed budget of expenses related to environmental mitigation plans and technologies for the DNGS. We request a budget for the test period, as well as one for the continued operation of the DNGS.

Reference: Ex. D2-02-01, Attachment 4-12, Program Environmental Management Plan (Program EMP)

3. How will this Program EMP integrate continuing environmental studies and monitoring required by the EA and EA Follow-up Program?
4. Please provide copies of the following documents:
 - (a) The *Environmental Vision*, referenced in the Program EMP
 - (b) The Ontario Power Generation (OPG) Environmental Management System (EMS)
 - (c) The Project Oversight Standard (N-STD-AS-0030)
 - (d) The Nuclear Refurbishment - Environmental Requirements Guideline (N-GUID-09701-10013)
 - (e) The Nuclear Refurbishment - Project Environmental Management Plan (NK38-PLAN-09701-10149)

- (f) The Proposal for Refurbishment Chemistry & Environment Metrics (NK38-REP-09701-10145)
- (g) The Risk Project Management Standard (N-PROC-LE-0028)

Reference: Darlington Nuclear Refurbishment and Continued Operation Environmental Assessment Follow-up Program.

- 5. For each of the following studies described in the Follow-up Program:
 - (a) 2.1 Program Element 1: Effluent Characterization Program
 - (b) 2.2 Program Element 2: Stormwater Control Study
 - (c) 2.3 Program Element 3: Thermal Monitoring Program
 - (d) 2.4 Program Element 4: Entrainment and Impingement Mortality MonitoringPlease address the following:
 - (e) Has OPG begun to implement the Program?
 - (f) Please provide a detailed budget of expenses expected to implement the Program.
- 6. For the impingement and entrainment monitoring under part of Program Element 4:
 - (a) What compensatory mechanisms will OPG pursue to offset biota and habitat losses resulting from DNGS operations?
 - (b) Please provide a detailed budget of expenses related to these compensatory measures.

Reference: Darlington Nuclear Refurbishment and Continued Operation Environmental Assessment Follow-up Program. 3.0 Adaptive Management

- 7. Please provide a detailed budget of expenses related to planning and implementing adaptive management programs during the test period and continuing operation of the DNGS.

Reference: Canadian Nuclear Safety Commission, Record of Proceedings Including Reasons for Decision, Environmental Assessment Screening, Darlington Refurbishment

- 8. Paragraph 43 referenced a Best Available Technology Economically Achievable (BATEA) study drafted by OPG and reviewed by Canadian Nuclear Safety Commission staff and the Department of Fisheries and Oceans (DFO). Please provide a copy of this study.
- 9. Paragraph 55 referenced a Round Whitefish Action Plan (RWAP) to understand the local population status of the species. The study was also required to include a “series of assessments on the potential impacts of the diffuser on the survival of round whitefish eggs and larvae”. Please provide a copy of this study.