AMPCO Interrogatory #18

Interrogatory

Reference: Ex D2 T1 S1 P6

OPG indicates a technical assessment will consider an asset replacement relative to the base case of maintaining the asset through preventative and/or corrective maintenance.

a) Please discuss the decision-making process OPG follows to make the technical assessment of replace versus maintain an asset. Provide any criteria used.

b) Please provide any internal documents that govern this technical assessment process.

c) How can ratepayers be assured that nuclear assets are not being replaced prematurely?

d) Does OPG expect any OM&A savings over the test period resulting from asset replacement versus preventative and/or corrective maintenance? Please discuss.

Response

a) See Ex. L-D2-01-AMPCO-041, part c).

b) Internal documents that govern the technical assessment process, including asset management, equipment reliability, obsolescence and aging processes are listed below. Item 1 is captured in Ex. L-D2-01-Energy Probe-015, Attachment 1. Items 2-6 are enclosed in Attachment 1:

1. Nuclear Asset Management and Investment Planning N-PROC-AS-0084 (Please see Ex. L-D2-01-Energy Probe-015, Attachment 1)
2. Equipment Reliability N-PROG-MA-0026
3. Equipment Reliability Implementation N-PROC-MA-0097
4. Obsolescence Management N-STD-MA-0024
5. Integrated Aging Management N-PROG-MP-0008
6. Aging Management Process N-PROC-MP-0060

c) See Ex. L-D2-01-AMPCO-041, part c).

d) OPG does not expect additional OM&A savings over the IR term resulting from asset replacement compared to preventative and/or corrective maintenance. Rather, when savings are realized, the maintenance resources that would have supported maintenance on the obsolete and or life-expired equipment being replaced can be redirected to other assets requiring more critical maintenance work.