AMPCO Interrogatory #89

Interrogatory

Reference: Ex D2 T2 S10

a) For each of the years 2005 to 2020, please identify the Business Unit accountable for the D2O Storage Project and explain any changes.

b) Please provide the organizational structure of the D2O Storage Project over the course of the project.

c) Please provide a list of Project Managers (PM) for the D2O Storage Project over the course of the project. Please provide the years of experience of each PM and a list of the other projects they were managing simultaneously.

d) Please provide the forecast versus actual overtime costs allocated to the D2O Storage Project by year over the course of the project for all staff, contractors and trades workers.

e) Please provide all correspondence to contractors instructing or approving them to work premium overtime hours.

Response

a) The D2O Storage Project began in 2010 when the heavy water storage needs of the DRP were merged with operational improvement storage. From that time until the completion of the project the project was sponsored by the Refurbishment Organization and executed by Projects.

b) Please see Ex. L-D2-02-AMPCO-137 Attachments 58 and 59 and Attachment 1 to this response.

c) OPG declines to provide the requested information on the basis of relevance. The names and experience of project managers on the D2O Storage Project would not provide any useful information for determining the prudence of OPG's expenditures on this project. OPG is responsible for the outcomes on this project, not the individuals who served as project managers.

d) OPG is unable to provide the requested information as it is not available. OPG did not forecast overtime and thus cannot provide the annual use of overtime against forecast.

e) OPG is unable to provide the requested information as it is not available.