AMPCO Interrogatory #91

Interrogatory

Reference: Ex D2 T2 S10 P2, P51

OPG describes the D2O project a first of a kind and one-of-a-kind facility.

a) On what basis does OPG characterize the D2O project as a first of a kind and one-of-a-kind facility?

b) What is the industry norm/best practice with respect to storing D2O during refurbishment activities?

c) What is unique about the scope of the D2O project compared to industry best practice?

Response

a) The D2O Storage Project facility is first of a kind because OPG has not previously undertaken a project with this scope, scale and functionality. Had OPG characterized it as "one-of-a-kind,"[1] it would have been for largely the same reasons. In the context of project management and design, the designation "one-of-a-kind," is used to distinguish projects/designs that are a repeat of prior efforts, or "nth of a kind," from those which are not. It is not a synonym for "unique." That said, OPG is unaware of another facility like the D2O Storage Project in the nuclear industry as explained in part c).

b) OPG believes that no "industry best practice" exists regarding the storage of heavy water during refurbishment. There have been a very limited number of CANDU reactor refurbishments, each of which involved:
   - different numbers of reactors of different sizes and configurations;
   - differing refurbishment schedules and thus different needs for heavy water storage during refurbishment; and
   - different options for addressing their heavy water storage needs.

   Ex. D2-2-10, pp.42 and 106 discuss the information that OPG gathered about Bruce Power's approach.

[1] OPG's evidence characterizes the HWMB/TRF as one-of-a-kind, not the D2O Storage Project (Ex. D2-2-10, p. 51, lines 14-16). In the context of discussing the configuration and operation of that completed facility, rather than a project, the evidence uses one-of-a-kind to mean unique.

c) The D2O Storage Project had the following unique aspects:

- The need to integrate the storage in the D2O Storage Project facility with the operation of the Heavy Water Management Building and Tritium Removal Facility ("HWMB/TRF");
- The fact that the project was constructed within the protected area of an operating nuclear generating station with one unit undergoing refurbishment;
- The amount of heavy water stored in the D2O Storage Project facility; and
- OPG's commitment to limit tritium emissions from the facility.