Board Staff Interrogatory #155

Interrogatory

Reference:
Exhibit D2 / Tab 2 / Schedule 10 / p. 53
Exhibit D2 / Tab 2 / Schedule 10 / Attachment 2q / p. 3

Preamble:

OPG stated that the RFP for the D2O Storage Project instructed the proponents to assume that the project would involve uncontaminated soil that could be disposed of in a conventional landfill.

OPG also stated that soil testing revealed low levels of tritium in some of the soil. The presence of low levels of tritium above the free release limits of the Darlington license required ongoing testing and that the excavated soil be placed in a laydown area so any remaining tritium could dissipate prior to permanent soil disposal.

OPG also stated that to create a lay down area to accommodate the soil and bedrock generated by the project, OPG increased the scope of its purchase order with its contractor to construct the soil lay down area.

Question(s):

a) Why did OPG ask proponents to assume that the project would involve uncontaminated soil given knowledge of the spill in 2009?

b) Please clarify the difference or similarity between the criterion of “free release limits” and “regulatory limits”.

Response

a) To elaborate on the explanation in the evidence (Ex. D2-2-10, p. 53, lines 7-10), and as discussed in Ex. L-D2-02-Staff-152, OPG was still investigating the extent to which tritium from the original spill had migrated to the project site at the time of the RFP. As a consequence, the degree of contamination and the type of treatment that ultimately would be required were unknown. OPG did not want the proponents’ differing assumptions about the costs to address tritium in the soil to drive differences in their bid price. To make the bids comparable in this respect, OPG instructed both proponents to assume for purposes of their proposals that the soil could be disposed of in a non-hazardous landfill site.

b) The term “free release” applies to material that contains radioactivity at levels sufficiently low that it could be received by any willing site. The term “Regulatory limits” refers to material containing radioactivity at levels which would require it to be handled by facilities licensed by the Canadian Nuclear Safety Commission.