PWU Interrogatory #22

Interrogatory

References:

Reference 1: Exhibit F2, Tab 1, Schedule 1, Page 12 of 29

> The Collective Radiation Exposure improved for Pickering resulting in maximum NPI points, and improved for Darlington while remaining in the third quartile. Positive gains were seen from site innovations such as leveraging technology to avert dose using robotic equipment and remote monitoring of systems, and the early completion of planned outages.

Reference 2: Exhibit F2, Tab 1, Schedule 1, Attachment 6, Page 11 of 42

Process Area Summary	Regular	Term	Total Regular HC	Non-Regular	Augmented Staff	Oncore Hourly	Other Purchased Services	Total Contractor FTEs	Total OPG FTEs	2019 Goodnight Benchmark	Variance	%
Administrative Services	98		98	7				7	105	129	(24)	-19%
Configuration Management	182		182	2	4	4	13	23	205	337	(132)	-39%
Equipment Reliability	398	2	400	28	7		26	61	461	590	(129)	-22%
Loss Prevention	139		139	2	5	16	14	37	176	201	(25)	-12%
Operate The Plant	854	156	1,010	8	3		10	21	1,031	1,073	(42)	-4%
Personnel Services	580	27	607	40	24	11	3	78	685	600	85	14%
Plant Maintenance	928	149	1,077	260		114	19	393	1,470	1,225	245	20%
Radiation Protection	122	4	126	12			20	32	158	287	(129)	-45%
Security*	31		31	2	1		3	6	37	97	(60)	-62%
Supply Chain	177		177	6	1	1	1	9	186	235	(49)	-21%
Work Management	346	7	353	16	11	9	3	39	392	417	(25)	-6%
Below the Line	93	11	104	1	5			6	110	64	46	72%
Benchmarked Total	**3,948**	**356**	**4,304**	**384**	**61**	**155**	**112**	**712**	**5,016**	**5,255**	**(239)**	**-4.5%**

Questions

a) Does OPG accept that the 2019 Goodnight Benchmarks are appropriate benchmarks for its workplace? If not, why not?
b) How can OPG operate its nuclear facilities safely if its radiation protection workforce is understaffed by 45%?
c) Is Collective Radiation Exposure (as described in the reference above) the sole metric used by OPG to measure the adequacy of its radiation protection, or are there any others?
d) How many radiation protection FTEs are there in 2021 compared to 2019?
e) How can OPG operate its nuclear facilities safely if its security workforce is understaffed by 62%?
f) How many security FTEs are there in 2021 compared to 2019?
g) How can OPG operate its nuclear facilities safely if its equipment reliability

workforce is understaffed by 22%?

h) How many equipment reliability FTEs are there in 2021 compared to 2019?

i) Does OPG's workforce plan address these FTE deficiencies at Pickering in the near term and Darlington in the long term?

Response

a) Goodnight Consulting has prepared the nuclear staffing industry benchmark based on technical adjustments and scaling in relation to the peer group. OPG accepts that the benchmarks reflected in the Goodnight study are appropriate for its workplace.

b) OPG's radiation protection workforce is not understaffed. The Goodnight study showed that OPG had 45% less staff than the radiation protection benchmark (Ex. F2-1-1, Attachment 6, p. 11). The Goodnight study noted that this benchmarking performance is "offset by line personnel qualified to provide self monitoring and also, if certified, to monitor the activities of groups" (Ex. F2-1-1, p. 24).

c) Collective Radiation Exposure ("CRE") is not used by OPG to measure the adequacy of its radiation protection. The CRE measures whole body radiation exposure (Ex. F2-1-1, Attachment 2, p. 90). CRE is the main radiation indicator used by OPG for benchmarking purposes and is the only radiation protection metric included in the Nuclear Performance Index (Ex., F2-1-1, Attachment 2, pp. 15-19).

d) A functional mapping of full-time equivalent ("FTE") staff based on the application of the Goodnight Staffing methodology is not available for 2021. Goodnight's benchmarking methodology allows for comparisons of actual staffing data to the industry benchmark. OPG's staffing data in the Goodnight benchmarking study was as of August 31, 2019.

e) OPG's security workforce is not understaffed. The Goodnight study indicated that only a subset of Security staff have been included in the study since this is protected information (Ex. F2-1-1, p. 11).

f) Security Operations FTEs cannot be disclosed consistent with OPG Security policy.

g) OPG's equipment reliability workforce is not understaffed. OPG's equipment reliability process area was 22% below benchmark while OPG continued to maintain high levels of safety and strong safety performance in 2019. For example, Darlington and Pickering continued to demonstrate first quartile performance in Total Recordable Injury Frequency ("TRIF"), with OPG achieving its lowest TRIF in the history of the company in 2019. OPG was the top TRIF performer in 2019 compared to its peer group (Ex. F2-1-1, p. 12).

h) See OPG's response to part d).

i) There is no FTE deficiency at Pickering. OPG is operating its plants safely and efficiently. The People Powering the Future initiative focusses on ensuring work programs are resourced appropriately in accordance with the 2020-2026 Business Plan while minimizing the organizational and financial impacts associated with the transition to post-Pickering operations (Ex. F2-1-1, pp. 23-24).