Society Interrogatory #14

Interrogatory

Reference:
Exhibit F2-01-01: Business Planning p10 ln 6-10.

The main conclusions of the 2019 Goodnight Nuclear Staffing Study are as follows … The analysis showed that OPG, as of August 2019, is 239 Full-Time Equivalents ("FTEs") (4.5%) below the total North America nuclear operator benchmark of 5,255 FTEs.

a) Please explain why OPG has understaffed its nuclear facilities by 4.5% as compared to its US counterparts.
b) Has this understaffing affected plant safety in any way?
c) Does the understaffing indicate that OPG staff are more productive and efficient than the North America nuclear operator benchmark staff?

Response

a) OPG has not understaffed its nuclear facilities. Rather, based on the 2019 Goodnight nuclear staffing analysis, OPG has been able to maintain safe, reliable operations with 4.5% less staff compared to the benchmark.

b) As noted in Ex. F2-1-1, p. 12, OPG's nuclear generating stations continued to demonstrate strong safety performance. 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. Darlington achieved maximum Nuclear Performance Index ("NPI") results or best quartile performance for six of seven NPI safety sub-metrics, while Pickering achieved similar results on seven of seven safety sub-metrics.

c) As discussed in part a), OPG's facilities are not understaffed. OPG has invested in training and skills development, which increases the productivity and efficiency of its workforce. OPG has no basis to opine on the relative productivity and efficiency of its staff in comparison to that of other North American nuclear operators.