ONTARIOPOWER GENERATION

Records File Information:
FILE ELECTRONICALLY WITH
SCR

Internal Use Only

N-FORM-10134-R003*

Barrier Analysis Worksheet

Adverse Condition	Barrier(s) that should have precluded Condition	How the Barrier Failed	Why(s) the Barrier Failed
Construction proceeded in paralled with remaining design work	Contractual provisions regarding regulatory risk	No explicit provision in contractual documents regarding compliance with fire protection codes	Section 4.53 of N-COI-00120-00001 (Contractor\owner Interface Requirements For Nuclear) only mentions the need for EPC vendor to complete a Third Party Fire Review Report. There is no reference to CSA N293, for example. The project-specific N-FORM-11583 (issued as NK38-COI-38000-10001 for the D2O Project in 2018) did not explicitly mention fire requirements either.
Lack of awareness for non-expert staff (fire protection requirements and regulatory implications)	Training	No training provided	No explicit or systematic training in CSA N293 or NBCC required for either OPG or EPC vendor design engineers, as well as EPC project managers

*Associated with N-STD-RA-0008, Incident Investigation

Barrier Analysis Worksheet