AMPCO Interrogatory #87

Interrogatory

Reference: Ex D2 T2 S10

The drum handling, storage, testing and cleaning facility supports the regular transportation of heavy water to and from the Pickering and Bruce stations for Detritiation, and supports occasional heavy water transactions with other parties.

a) Did OPG evaluate the options for drum cleaning? If yes, please provide the cost benefit analysis that was performed in support of the business case of alternatives to construct, operate, and maintain a drum cleaning facility.

b) Did OPG obtain cost information from vendors for off-site drum cleaning services? If yes, provide the service cost per drum.

c) How is OPG currently cleaning drums?

d) How many drums are cleaned per year at Darlington and Pickering and at what cost?

e) How many D2O drums have been disposed of at Darlington and Pickering over the last 15 years?

f) What is the final cost for the drum handling, storage, testing and cleaning facility?

Response

a) Yes. In December 2004, Kinectrics completed a study in aid of OPG developing its heavy water storage and handling strategy, including the options available for drum management (i.e. drum handling, storage, testing and cleaning) (see Attachment 1 for a copy of this report).

As explained in Ex. D2-2-10, pp. 36-39; Attachment 2a, pp. 6-7; and Attachment 2k, pp. 5 and 7, in late 2005, OPG had identified in its evaluation of the scope of the Operational Improvement Project that OPG's drum management needs could be satisfied by constructing a drum storage, handling and testing facility at Darlington and a drum cleaning facility at Pickering (the "Pickering Project"). This scope was further supported by a subsequent 2007 Kinectrics study of the preferred

solution for OPG heavy water storage management and drum handling (see Ex. L-D2-02-AMPCO-131, Attachment 5).

The Operational Improvement Project and the Pickering Project were subsequently deferred as a result of OPG commencing the initiation phase of the Darlington Refurbishment Program, and ultimately, a revised project charter (see Ex. D2-2-10, Attachments 2b and 2c) was executed that merged Darlington's heavy water storage needs for operational improvement and refurbishment into a single D2O Storage Project, inclusive of a drum storage, handling, testing and cleaning area. As a result, the Pickering Project was no longer needed and was cancelled.

b) No. Drum cleaning services were not widely available in the market and both drum cleaning and pressure testing capabilities are pre-requisites for the re-use of drums. Drums were therefore stored or those with visible defects were disposed of as stated in part e). As a result, OPG included drum cleaning facilities in the construction of the D2O Storage Project's drum processing area.

c) – d) Prior to the use of the D2O Storage Project's drum processing area, neither Darlington, Pickering nor Bruce Power had facilities available to clean drums.

e) Pickering and Darlington have shipped a total of approximately 2200 drums off-site for disposal over the last 15 years.

f) OPG cannot provide the final cost of the D2O Storage Project's drum handling, storage, testing and cleaning facility. Once the Operational Improvement Project needs were merged with the DRP storage needs to form the D2O Storage Project, the project became an integrated whole. Thus, for example, the concrete slab that forms the roof of the seismic dike is also the base for the building's first floor, where the drum handling, testing and cleaning facility is located.