AMPCO Interrogatory #136

Interrogatory

Reference: Ex D2 T2 S11 Attachment #3

Bates White compares the D2O Storage Project to the Salt Waste Process Facility (SWPF), located at the Savannah River Site in Aiken, South Carolina, as a means to test the reasonableness of Bates White's estimate for the D2O Storage Project.

D2-AMPCO-137_Attachment A provides the US Department of Energy (DOE) February 2020 project management dashboard for the SWPF which shows the cost has soared from $900 million to $2.3 billion and start-up has been delayed since 2013.

a) Please explain why Bates White selected the SWPF project as a comparator.

b) Please provide the decision criteria used to select comparator projects.

c) Please provide other projects considered as comparators but not selected and indicate why.

d) Please confirm the $2.3 billion costs for the SWPF doesn't include other operating costs.

Response

The following responses were prepared by Bates White:

a) and b)

In evaluating projects as potential comparators for the D2O Storage Project, Bates White used several criteria to determine whether projects would be comparable. These criteria included the following: Was the project, (1) a liquid radioactive material processing facility; (2) of relatively similar size and complexity; (3) like the D2O project, at or near completion; and (4) described in sufficient detail in publicly available information. SWPF met these criteria.

c) We note that the Integrated Waste Treatment Unity ("IWTU") was also used as a comparator for the D2O Storage Project. Although we considered other potential comparators, none met the criteria described in the above response as clearly as these two projects.

d) The $2.3 billion figure represents the agreed-upon construction costs for SWPF; the construction contractor was awarded a separate USD$380 million contract for the commissioning and one year of demonstration operation of the SWPF.