UNDERTAKING JT1.29

Undertaking

TO PROVIDE DATA ON STAFFING DIFFERENCES WHEN ALL FOUR UNITS WERE ONLINE BEFORE THE REFURBISHMENT STARTED, VERSUS HOW MANY WERE WORKING ON STEADY-STATE OPERATIONS WHILE ONE OF THE UNITS WAS OFFLINE

Response

This undertaking response is with reference to the Goodnight Staffing report.

As shown in Chart 1 below, the number of full-time equivalent ("FTE") staff working on Darlington operations in March 2016 was 1,032.6 FTEs when four units were operating prior to the October 2016 start of refurbishment execution. In August 2019, while Unit 2 was undergoing refurbishment, the number of FTEs working on Darlington operations had increased by 18.1 FTEs to 1,050.7 FTEs. These staffing levels are consistent with the Goodnight Consulting nuclear staffing benchmarking methodology and include Regular, Term, Non-Regular and Augmented staff for the current Darlington NGS organizational structure.[1] The minor staff increase was primarily in Maintenance functions.

Chart 1: Darlington FTEs Before and During Refurbishment Execution

	March 2016	August 2019	Increase
Darlington NGS FTEs per Goodnight Staffing Benchmarking Methodology	1,032.6	1,050.7	18.1

As noted in Ex. L-F2-01-SEC-124, part f), the level of FTE staff is largely fixed and does not scale up and down proportionally with how much electricity the Darlington units generate. Exhibit L-F2-02-Staff-230, part b) also notes that the majority of costs associated with Darlington remain fixed even if one unit is in refurbishment.

[1] Per EB-2016-0152, Ex. L-6.2-19 SEP-003 and Ex. F2-1-1, Attachment 6.