Board Staff Interrogatory #235

Interrogatory

Reference:
Exhibit F2 / Tab 3 / Schedule 3 / Tables 1-4
Exhibit F2 / Tab 3 / Schedule 1 / Table 1

Question(s):

a) Please explain why the IFN Stacking Frame Replacement project shows a final completion date of December 2022 when there is no spending in 2022.

b) Please explain why the Fuel Channel Life Extension project shows a final completion date of December 2021 when there is spending in 2022.

c) Please provide rationale supporting the need for the Pickering 58 Digital Control Computer Hardware Modernization project in the context of the Pickering NGS shutdown.

d) Please advise how much of the total Pickering NGS project costs related to projects with total costs of less than $5 million ($34.2 million) are included in the 2022-2026 project OM&A budget and advise in which line items in Table 1 of Exhibit F2 / Tab 3 / Schedule 1 / those amounts are included.

e) Please confirm that the three unallocated projects for Pickering NGS (Polychlorinated Biphenyl Lighting Ballasts Replacement, North Yard Fire Header Repair, D2O Upgrading Plant A Towers Removal) cost $11.5 million in total over the 2022-2026 period (as shown in the Unallocated Projects table under Table 1 of Exhibit F2 / Tab 3 / Schedule 1).

f) Please discuss each of Polychlorinated Biphenyl Lighting Ballasts Replacement, North Yard Fire Header Repair, D2O Upgrading Plant A Towers Removal and explain why these projects are necessary in the context of the Pickering NGS shutdown.

Response

a) Project #80067 Darlington Irradiated Fuel Bay Stacking Frame Replacement has a BCS completion date of December 2022. The project is forecasted to be completed earlier than expected and therefore no expenditures are expected in 2022.

b) Project #80014 Fuel Channel Life Extension project has a BCS completion date of December 2021. Project scope increases have arisen due to additional work required to demonstrate continued major component fitness for service. The project is currently scheduled for completion in December 2024 where the expected scope increase would be funded through project contingency.

c) Project #80135 Pickering 58 Digital Control Computer ("DCC") Hardware Modernization enables the DCC to be functional prior to and beyond 2025. The DCC are required to support de-fueling of the reactor and provide ongoing irradiated fuel monitoring signals.

d) The Tier 3 Pickering Projects totaling ($34.2M) included in Ex. F2-3-3 Table 3 refer to the total cost of all projects less than $5M. There are no expenditures associated with these projects in the 2022-2026 project OM&A budget that is captured in Ex. F2-3-1, Table 1, line 2; as these projects are completed or in the process of being completed.

e) The three unallocated projects for Pickering NGS (Polychlorinated Biphenyl Lighting Ballasts Replacement, North Yard Fire Header Repair, D2O Upgrading Plant A Towers Removal) are not projects with approved BCS, and therefore no cost estimate has been provided. If these projects proceed, they will be funded from the Projects Portfolio (Unallocated) component of the Nuclear project portfolio as shown in Ex. F2-3-1, Table 1, Line 4.

f) Polychlorinated Biphenyl Lighting Ballast Replacement: This project is to remove the existing light ballasts which contains Polychlorinated Biphenyl ("PCB") greater than 50 parts per million (ppm). Per Ministry of Environment (SOR/2008/273), such equipment with PCB can no longer be used and have to be destroyed or stored in designated storage facility by December 31, 2025.

North Yard Fire Header Repair: The Pickering fire protection buried outdoor ring header has an active piping failure in the north yard. Piping failures can result in fire system impairments, sinkholes, and flooding. These failures can result in safety hazards, equipment damage, extensive corrective maintenance costs, and challenges to the organization to deal with the repair in a timely manner.

D2O Upgrading Plant A Towers Removal: The Upgrading Plant A Tower was taken out of service in 1994. In 2017, drone inspection found structural issues including rusted support members, rusted bolts, rust/cracks in welds. Based on engineering assessments, it was concluded that these structural issues could have a future adverse effect on the structural integrity of the towers.