Q. **Reference: Schedule 1, Page 14, lines 9-11. The Application states that "The existing fuel tanks 12C, 12E, and 12F will also be replaced with horizontal tanks in the size range of 60,000 - 80,000 litres."**

a) Please explain why Hydro chose not to replace the three horizontal tanks with one horizontal or vertical tank with larger capacity rather than three smaller horizontal tanks? Please include any analyses completed.

b) Please provide the most recent inspection reports for Tanks 12C, 12E, and 12F.

A. **a)** Newfoundland and Labrador Hydro ("Hydro") has developed a standard horizontal tank design that has been used in recent years in several of the isolated rural communities it serves, including Mary's Harbour, Charlottetown and Nain, as work in these locations often requires additional design considerations. The chosen 60,000L horizontal tank is sized such that it can be easily transported by road and coastal ferry. Transportation of tanks exceeding this size can be costly and logistically challenging, potentially requiring special permits and escorts for road travel and the use of a barge and tug boat.

As there is limited space available in the existing site, the new tanks will be strategically placed to fit inside the fence line, with insufficient space to accommodate a larger horizontal tank. A larger vertical tank was not considered as it must be placed inside the fuel dyke due to environmental regulations,[1] and there is insufficient space in the existing dyke for an additional tank. Additionally, multiple, smaller horizontal tanks can be relocated to several other Hydro-owned diesel-generating plants, eliminating asset-stranding concerns. A larger vertical tank could not be relocated due to its size and would have to remain on the current site until decommissioning.

[1] CAN/ULC-S655-15, *Standard for Aboveground Protected Tank Assemblies for Flammable and Combustible Liquids*.

b) Please refer to PUB-NLH-010, Attachment 1, Attachment 2, and Attachment 3 for the most recent inspection reports for Tanks 12C, 12E, and 12F, respectively.[2]

[2] The inspection report for Tank 12F, as included in Attachment 3 to this response, has incorrectly cited "12E" as the tank being inspected in the "Tag Number" section. The content of the report for Attachment 3 is related to 12F. The report for Tank 12E is included as Attachment 2.

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In-Service Inspection Form
(Atmospheric and Low Pressure Storage Tanks)

Tag Number: Rigolet: **12C**, L-GAP05-080101.03	**PO#/Work Order #:** NL1502	**Date of Inspection**: November 11, 2020
Equipment Type: Diesel Fuel Storage Tank	**Tank Status (Applicable Highlighted):** In Operation	**Inspection Type**: **(Applicable Highlighted):** External Only
Fabricator: Bursey Manufacturing	**Shell Material:** Carbon Steel	**Year Built**: 1998
Max. Operating Pressure: 7kPa	**Max. Operating Vacuum:** 300Pa	**Inspection Specification**: ULC-S601 / API 653
Nominal Thickness: **Head and Shell 5mm**	**Corrosion Allowance:** **Unknown**	**Report #:** **EXT-12031-NL2020-035**

		Checklist Details	Yes	No	N/A	Remarks
HS&E	1.	If this inspection requires a confined space entry (CSE) have all AS and Owner CSE procedures been reviewed by the inspection team?	☐	☐	☒	**External inspection only**
	2.	Has the tank been isolated utilizing blinds or blind flanges of the suitable pressure and temperature rating?	☐	☐	☒	
	3.	Have all required lockout/tagouts on electrical and mechanical equipment been installed and verified?	☐	☐	☒	
	4.	Has the installation of all positive blinding been verified in accordance with the blind list?	☐	☐	☒	
	5.	Have all inspection operatives reviewed the JSA/SJA and completed a Tool Box talk at the work site?	☐	☐	☒	
	6.	If applicable, is all job specific safety equipment and PPE identified in the JSA/SJA available to all inspection operatives?	☒	☐	☐	
	7.	If the tank assessment requires CSE prior to the tank being properly cleaned have all special precautions identified in A706-Q23 and API Publication 2217A been implemented?	☐	☐	☒	
PREPARATION		**Checklist Details**	**Yes**	**No**	**N/A**	**Remarks**
	1.	After discussions with operations and maintenance personnel have any abnormal operating conditions been identified?	☐	☒	☐	
	2.	Are all tank components sufficiently cleaned?	☒	☐	☐	
	3.	Has the equipment inspection history been reviewed?	☒	☐	☐	2014 External inspection and UT reports were reviewed.
	4.	Does the inspection history identify any previous integrity threats?	☐	☒	☐	
	5.	If an inspection pack specific to the equipment being examined has been generated, has it been reviewed prior to work commencement?	☐	☐	☒	
	6.	If applicable, has all specialized inspection equipment and tools identified in the inspection pack available?	☐	☐	☒	
	7.	Has the jurisdiction been notified in a timely manner of the equipment inspection?	☐	☐	☒	

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			Checklist Details	Yes	No	N/A	Remarks
EXTERNAL	ACCESS	1.	Perform an initial inspection of ladders, stairways, platforms and walkways from ground level. Does this initial show any obvious signs of damage?	☐	☒	☐	
		2.	Does the initial assessment of ladders, stairways, platforms and walkways warrant fall arrest to proceed with the inspection?	☐	☒	☐	
		3.	Do ladders, stairways, platforms and walkways show signs of buckling, deflection, missing ladder rings, excessively worn stair treads or other structural damage?	☐	☒	☐	
		4.	Do ladders, stairways, platforms and walkways show signs of coating deterioration, significant corrosion, cracking at welds?	☒	☐	☐	Minor coating failure noted with light surface corrosion on exposed metal.

			Checklist Details	Yes	No	N/A	Remarks
EXTERNAL	SUPPPORTS	1.	For steel support structures, are there any signs of corrosion, distortion or cracking?	☐	☐	☒	No access to saddle support. Tank sits in a steel containment basin. The basin sits on top of pressure treated dunnage.
		2.	Are there any signs of coating deterioration or associated corrosion?	☐	☐	☒	No access inside basin at the time of inspection. CSE is required.
		3.	Is there any evidence of mechanical shock or freezing?	☐	☒	☐	
		4.	Are anchor bolts securely fastened? Does the area of contact show any evidence of corrosion or distortion?	☐	☐	☒	Couldn't check presence or condition of saddle anchor bolts due to their location inside the basin.
		5.	Is there any evidence of corrosion on ground lugs and is good electrical contact maintained?	☐	☒	☐	No ground connection found.
	STRUCTURE AND SHELL	1.	Is there any evidence of settling of the tank?	☐	☒	☐	
		2.	If settling is evident are there signs of distortion or cracking in areas adjacent the nozzles and associated welds?	☐	☐	☒	
		3.	Are there any signs of leaks at flanged connections?	☐	☒	☐	No fuel was noted inside the basin.
		4.	Is all bolting tight and extending fully through the nut?	☒	☐	☐	
		5.	Do any external surfaces including welds show signs of corrosion?	☒	☐	☐	Corrosion noted where coating had failed.
		6.	If there are areas of external corrosion have the areas been quantified?	☐	☒	☐	
		7.	Is there any evidence of fatigue type defects at welds?	☐	☒	☐	
		8.	Are there any signs of damage to coatings, insulation or fire proofing?	☒	☐	☐	Minor coating failure noted.
		9.	Are there any signs of corrosion or mechanical damage to insulation fastening components?	☐	☐	☒	Tank is not insulated.
		10.	If applicable, are there signs of water ingress, corrosion under insulation, coatings or fireproofing?	☐	☐	☒	
	ATTACHMENTS	1.	Do any tank attachments such as valves, level gauges, etc. show signs of corrosion or mechanical damage?	☐	☒	☐	
		2.	Do any nozzles associated with tank attachments show any signs of damage associated with the attachment?	☐	☒	☐	
		3.	Is there a relief device(s) associated with this tank?	☐	☒	☐	Open to atmosphere
		4.	If VRD's are attached is the service date current?	☐	☐	☒	

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Inspection Details

- **The horizontal tank was constructed to ULC-S601, is single walled, and sits inside a steel containment basin.**
- **The tank was last inspected (externally) in 2014, including UT thickness readings. No previous internal inspection history was provided.**
- **The basin was not entered (it is considered a confined space), but it did have an access hatch on the West end of the tank. There was a limited view of the basin sump, and the West head of the tank.**
- **Scattered coating failure noted on the basin, tank, ladder, and nozzles. Light surface corrosion was found on exposed metal.**
- **No ground connection to the tank or basin was found.**
- **Nameplate was securely attached and mostly legible. Paint partially obscured the edges.**
- **The lid to the refuelling box is corroded through along the West side.**
- **UT thickness readings taken on all sides and top and compared to the 2014 UT data. No issues were identified. Refer to report UT-12031-NL2020-013.**
- **Tank is in serviceable condition.**

Recommendations/Disposition;

- **Repair or replace corroded refuelling box lid.**
- **Monitor coating on top of tank and repair as needed.**
- **Install proper ground connection.**
- **During the next internal inspection, get UT completed on the bottom of the shell. While doing that inspection use the confined space monitor to complete a visual inspection of the tank inside the basin.**
  Perform external and internal inspections at the next required interval.

Inspection Photos

12C overview

Nalcor tag

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Nameplate partially painted over	Beginnings of coating failure on top of shell
	
Refuelling box lid corroded through	Overview of West head showing drain nozzle and sump

Final Sign Off	In-Service Inspector	Reviewed	Owner Representative
Name	**Ian Fong**	**Brian Pretty**	
Sign			
Date	**December 13, 2020**	**December 15, 2020**	
Copied To:			

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In-Service Inspection Form
(Atmospheric and Low Pressure Storage Tanks)

Tag Number: Rigolet: **12E**, L-GAP05-080101.05	**PO#/Work Order #:** NL1502	**Date of Inspection**: November 11, 2020
Equipment Type: Diesel Fuel Storage Tank	**Tank Status (Applicable Highlighted):** In Operation	**Inspection Type**: **(Applicable Highlighted):** External Only
Fabricator: Avalon Welding	**Shell Material:** Carbon Steel	**Year Built**: 1997
Max. Operating Pressure: 7kPa	**Max. Operating Vacuum:** 300Pa	**Inspection Specification**: ULC-S601 / API 653
Nominal Thickness: **Head and Shell 6mm**	**Corrosion Allowance:** **Unknown**	**Report #:** **EXT-12031-NL2020-036**

		Checklist Details	Yes	No	N/A	Remarks
HS&E	1.	If this inspection requires a confined space entry (CSE) have all AS and Owner CSE procedures been reviewed by the inspection team?	☐	☐	☒	**External inspection only**
	2.	Has the tank been isolated utilizing blinds or blind flanges of the suitable pressure and temperature rating?	☐	☐	☒	
	3.	Have all required lockout/tagouts on electrical and mechanical equipment been installed and verified?	☐	☐	☒	
	4.	Has the installation of all positive blinding been verified in accordance with the blind list?	☐	☐	☒	
	5.	Have all inspection operatives reviewed the JSA/SJA and completed a Tool Box talk at the work site?	☐	☐	☒	
	6.	If applicable, is all job specific safety equipment and PPE identified in the JSA/SJA available to all inspection operatives?	☒	☐	☐	
	7.	If the tank assessment requires CSE prior to the tank being properly cleaned have all special precautions identified in A706-Q23 and API Publication 2217A been implemented?	☐	☐	☒	
PREPARATION		**Checklist Details**	**Yes**	**No**	**N/A**	**Remarks**
	1.	After discussions with operations and maintenance personnel have any abnormal operating conditions been identified?	☐	☒	☐	
	2.	Are all tank components sufficiently cleaned?	☒	☐	☐	
	3.	Has the equipment inspection history been reviewed?	☒	☐	☐	2014 External inspection and UT reports were reviewed.
	4.	Does the inspection history identify any previous integrity threats?	☐	☒	☐	
	5.	If an inspection pack specific to the equipment being examined has been generated, has it been reviewed prior to work commencement?	☐	☐	☒	
	6.	If applicable, has all specialized inspection equipment and tools identified in the inspection pack available?	☐	☐	☒	
	7.	Has the jurisdiction been notified in a timely manner of the equipment inspection?	☐	☐	☒	

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			Checklist Details	Yes	No	N/A	Remarks
EXTERNAL	ACCESS	1.	Perform an initial inspection of ladders, stairways, platforms and walkways from ground level. Does this initial show any obvious signs of damage?	☐	☒	☐	
		2.	Does the initial assessment of ladders, stairways, platforms and walkways warrant fall arrest to proceed with the inspection?	☐	☒	☐	
		3.	Do ladders, stairways, platforms and walkways show signs of buckling, deflection, missing ladder rings, excessively worn stair treads or other structural damage?	☐	☒	☐	
		4.	Do ladders, stairways, platforms and walkways show signs of coating deterioration, significant corrosion, cracking at welds?	☒	☐	☐	Coating failure noted with light surface corrosion on exposed metal.

			Checklist Details	Yes	No	N/A	Remarks
EXTERNAL	SUPPPORTS	1.	For steel support structures, are there any signs of corrosion, distortion or cracking?	☐	☐	☒	No access to saddle support. Tank sits in a steel containment basin. The basin sits on top of pressure treated dunnage.
		2.	Are there any signs of coating deterioration or associated corrosion?	☐	☐	☒	No access inside basin at the time of inspection. CSE is required.
		3.	Is there any evidence of mechanical shock or freezing?	☐	☒	☐	
		4.	Are anchor bolts securely fastened? Does the area of contact show any evidence of corrosion or distortion?	☐	☐	☒	Couldn't check presence or condition of saddle anchor bolts due to their location inside the basin.
		5.	Is there any evidence of corrosion on ground lugs and is good electrical contact maintained?	☐	☒	☐	No ground connection found.
	STRUCTURE AND SHELL	1.	Is there any evidence of settling of the tank?	☐	☒	☐	
		2.	If settling is evident are there signs of distortion or cracking in areas adjacent the nozzles and associated welds?	☐	☐	☒	
		3.	Are there any signs of leaks at flanged connections?	☐	☒	☐	No fuel was noted inside the basin.
		4.	Is all bolting tight and extending fully through the nut?	☒	☐	☐	
		5.	Do any external surfaces including welds show signs of corrosion?	☒	☐	☐	Corrosion noted where coating had failed.
		6.	If there are areas of external corrosion have the areas been quantified?	☐	☒	☐	
		7.	Is there any evidence of fatigue type defects at welds?	☐	☒	☐	
		8.	Are there any signs of damage to coatings, insulation or fire proofing?	☒	☐	☐	Minor coating failure noted.
		9.	Are there any signs of corrosion or mechanical damage to insulation fastening components?	☐	☐	☒	Tank is not insulated.
		10.	If applicable, are there signs of water ingress, corrosion under insulation, coatings or fireproofing?	☐	☐	☒	
	ATTACHMENTS	1.	Do any tank attachments such as valves, level gauges, etc. show signs of corrosion or mechanical damage?	☐	☒	☐	
		2.	Do any nozzles associated with tank attachments show any signs of damage associated with the attachment?	☐	☒	☐	
		3.	Is there a relief device(s) associated with this tank?	☐	☒	☐	Open to atmosphere
		4.	If VRD's are attached is the service date current?	☐	☐	☒	

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Inspection Details

- **The horizontal tank was constructed to ULC-S601, is single walled, and sits inside a steel containment basin.**
- **The tank was last inspected (externally) in 2014, including UT thickness readings. No previous internal inspection history was provided.**
- **The basin was not entered (it is considered a confined space), but it did have an access hatch on the North end of the tank. There was a limited view of the basin sump, and the North head of the tank, including nozzles.**
- **Scattered coating failure noted on the basin, tank, ladder, and nozzles. Light surface corrosion was found on exposed metal. More extensive coating failure noted on inside surfaces of the basin, especially the floor and near the floor.**
- **No ground connection to the tank or basin was found.**
- **Nameplate was securely attached and mostly legible, with paint obscuring some parts. A refurbishment plate from 2007 was attached to the North head above the nameplate.**
- **The lid on the North end of the basin is buckled. It may have been damaged during original shipping. The damage has not affected the tank nor the functioning of the basin.**
- **UT thickness readings taken on all sides and top and compared to the 2014 UT data. No issues were identified. Refer to report UT-12031-NL2020-013.**
- **Tank is in serviceable condition.**

Recommendations/Disposition;

- **Monitor coating on tank shell and repair as needed.**
- **Install proper ground connection.**
- **During the next internal inspection, get UT completed on the bottom of the shell. While doing that inspection use the confined space monitor to complete a visual inspection of the tank inside the basin.**
  Perform external and internal inspections at the next required interval.

Inspection Photos

12E overview

Nalcor tag

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	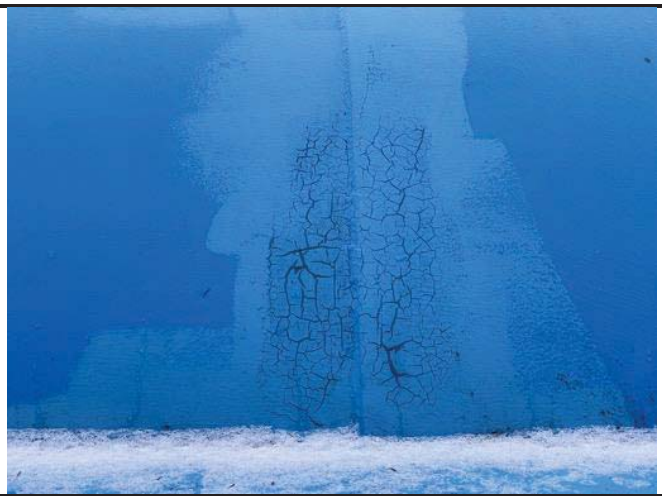
Nameplate partially painted over, refurbish plate above	Beginnings of coating failure on West side of shell
	
North lid of the basin is buckled	Overview of North head showing nozzle and coating failure

Final Sign Off	In-Service Inspector	Reviewed	Owner Representative
Name	**Ian Fong**	Brian Pretty	
Sign			
Date	**December 13, 2020**	December 15, 2020	
Copied To:			

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In-Service Inspection Form
(Atmospheric and Low Pressure Storage Tanks)

Tag Number: Rigolet: **12E**, L-GAP05-080101.06	**PO#/Work Order #:** NL1502	**Date of Inspection**: November 11, 2020
Equipment Type: Diesel Fuel Storage Tank	**Tank Status (Applicable Highlighted):** In Operation	**Inspection Type**: **(Applicable Highlighted):** External Only
Fabricator: Avalon Welding	**Shell Material:** Carbon Steel	**Year Built**: 1997
Max. Operating Pressure: 7kPa	**Max. Operating Vacuum:** 300Pa	**Inspection Specification**: ULC-S601 / API 653
Nominal Thickness: **Head and Shell 6mm**	**Corrosion Allowance:** **Unknown**	**Report #:** **EXT-12031-NL2020-037**

		Checklist Details	Yes	No	N/A	Remarks
HS&E	1.	If this inspection requires a confined space entry (CSE) have all TE and Owner CSE procedures been reviewed by the inspection team?	☐	☐	☒	**External inspection only**
	2.	Has the tank been isolated utilizing blinds or blind flanges of the suitable pressure and temperature rating?	☐	☐	☒	
	3.	Have all required lockout/tagouts on electrical and mechanical equipment been installed and verified?	☐	☐	☒	
	4.	Has the installation of all positive blinding been verified in accordance with the blind list?	☐	☐	☒	
	5.	Have all inspection operatives reviewed the JSA/SJA and completed a Tool Box talk at the work site?	☐	☐	☒	
	6.	If applicable, is all job specific safety equipment and PPE identified in the JSA/SJA available to all inspection operatives?	☒	☐	☐	
	7.	If the tank assessment requires CSE prior to the tank being properly cleaned have all special precautions identified in A706-Q23 and API Publication 2217A been implemented?	☐	☐	☒	
PREPARATION		**Checklist Details**	**Yes**	**No**	**N/A**	**Remarks**
	1.	After discussions with operations and maintenance personnel have any abnormal operating conditions been identified?	☐	☒	☐	
	2.	Are all tank components sufficiently cleaned?	☒	☐	☐	
	3.	Has the equipment inspection history been reviewed?	☒	☐	☐	2014 External inspection and UT reports were reviewed.
	4.	Does the inspection history identify any previous integrity threats?	☐	☒	☐	
	5.	If an inspection pack specific to the equipment being examined has been generated, has it been reviewed prior to work commencement?	☐	☐	☒	
	6.	If applicable, has all specialized inspection equipment and tools identified in the inspection pack available?	☐	☐	☒	
	7.	Has the jurisdiction been notified in a timely manner of the equipment inspection?	☐	☐	☒	

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			Checklist Details	Yes	No	N/A	Remarks
EXTERNAL	ACCESS	1.	Perform an initial inspection of ladders, stairways, platforms and walkways from ground level. Does this initial show any obvious signs of damage?	☐	☒	☐	
		2.	Does the initial assessment of ladders, stairways, platforms and walkways warrant fall arrest to proceed with the inspection?	☐	☒	☐	
		3.	Do ladders, stairways, platforms and walkways show signs of buckling, deflection, missing ladder rings, excessively worn stair treads or other structural damage?	☐	☒	☐	
		4.	Do ladders, stairways, platforms and walkways show signs of coating deterioration, significant corrosion, cracking at welds?	☒	☐	☐	Coating failure noted with light surface corrosion on exposed metal.

			Checklist Details	Yes	No	N/A	Remarks
EXTERNAL	SUPPPORTS	1.	For steel support structures, are there any signs of corrosion, distortion or cracking?	☐	☐	☒	No access to saddle support. Tank sits in a steel containment basin. The basin sits on top of pressure treated dunnage.
		2.	Are there any signs of coating deterioration or associated corrosion?	☐	☐	☒	No access inside basin at the time of inspection. CSE is required.
		3.	Is there any evidence of mechanical shock or freezing?	☐	☒	☐	
		4.	Are anchor bolts securely fastened? Does the area of contact show any evidence of corrosion or distortion?	☐	☐	☒	Couldn't check presence or condition of saddle anchor bolts due to their location inside the basin.
		5.	Is there any evidence of corrosion on ground lugs and is good electrical contact maintained?	☐	☒	☐	No ground connection found.
	STRUCTURE AND SHELL	1.	Is there any evidence of settling of the tank?	☐	☒	☐	
		2.	If settling is evident are there signs of distortion or cracking in areas adjacent the nozzles and associated welds?	☐	☐	☒	
		3.	Are there any signs of leaks at flanged connections?	☐	☒	☐	No fuel was noted inside the basin.
		4.	Is all bolting tight and extending fully through the nut?	☐	☒	☐	Bolt missing from manway flange.
		5.	Do any external surfaces including welds show signs of corrosion?	☒	☐	☐	Corrosion noted where coating had failed.
		6.	If there are areas of external corrosion have the areas been quantified?	☐	☒	☐	
		7.	Is there any evidence of fatigue type defects at welds?	☐	☒	☐	
		8.	Are there any signs of damage to coatings, insulation or fire proofing?	☒	☐	☐	Minor coating failure noted.
		9.	Are there any signs of corrosion or mechanical damage to insulation fastening components?	☐	☐	☒	Tank is not insulated.
		10.	If applicable, are there signs of water ingress, corrosion under insulation, coatings or fireproofing?	☐	☐	☒	
	ATTACHMENTS	1.	Do any tank attachments such as valves, level gauges, etc. show signs of corrosion or mechanical damage?	☐	☒	☐	
		2.	Do any nozzles associated with tank attachments show any signs of damage associated with the attachment?	☐	☒	☐	
		3.	Is there a relief device(s) associated with this tank?	☐	☒	☐	Open to atmosphere
		4.	If VRD's are attached is the service date current?	☐	☐	☒	

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Inspection Details

- **The horizontal tank was constructed to ULC-S601, is single walled, and sits inside a steel containment basin.**
- **The tank was last inspected (externally) in 2014, including UT thickness readings. No previous internal inspection history was provided.**
- **The basin was not entered (it is considered a confined space), but it did have an access hatch on the North end of the tank. There was a limited view of the basin sump, and the North head of the tank, including nozzles.**
- **Scattered coating failure noted on the basin, tank, ladder, and nozzles. Light surface corrosion was found on exposed metal. More extensive coating failure noted on inside surfaces of the basin, especially the floor and near the floor.**
- **No ground connection to the tank or basin was found.**
- **Nameplate was securely attached and mostly legible, with paint obscuring some parts. A refurbishment plate from 2007 was attached to the North head below the nameplate.**
- **The manway flange was missing 1 bolt.**
- **UT thickness readings taken on all sides and top and compared to the 2014 UT data. No issues were identified. Refer to report UT-12031-NL2020-013.**
- **Tank is in serviceable condition.**

Recommendations/Disposition;

- **Monitor coating on tank shell and repair as needed.**
- **Install proper ground connection.**
- **Replace missing bolt in manway flange.**
- **During the next internal inspection, get UT completed on the bottom of the shell. While doing that inspection use the confined space monitor to complete a visual inspection of the tank inside the basin.**
  Perform external and internal inspections at the next required interval.

Inspection Photos

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<td>12F overview</td>
<td>Nalcor tag</td>
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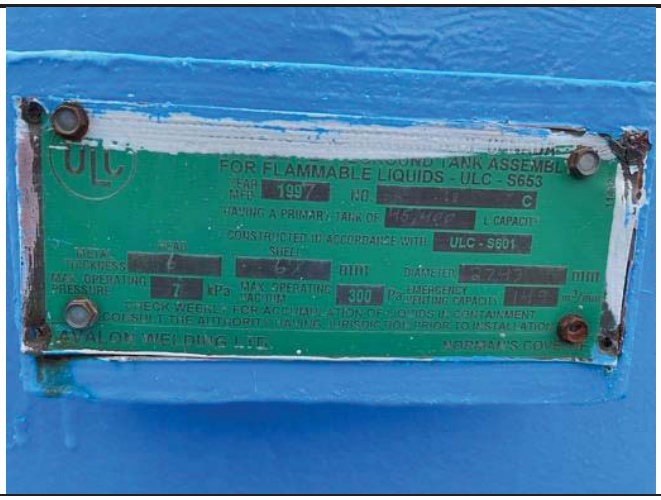
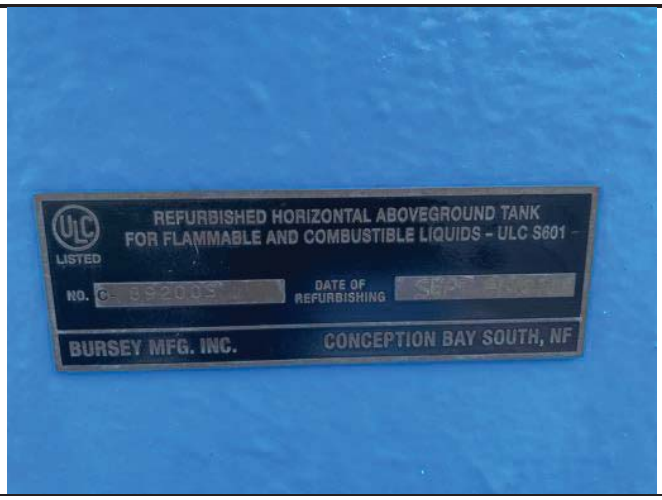
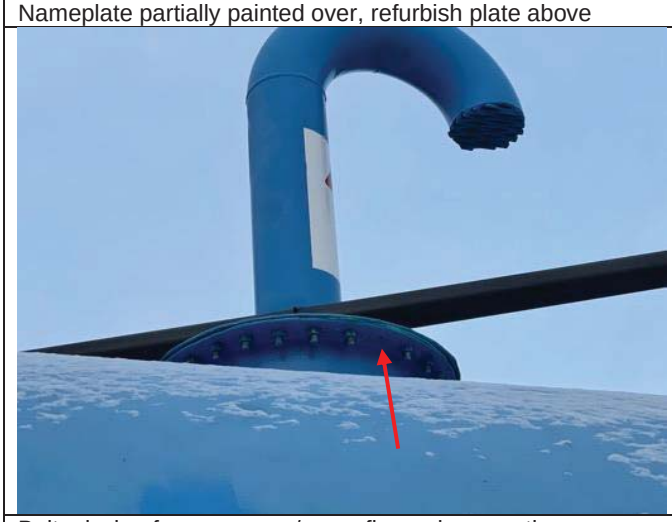


Nameplate partially painted over, refurbish plate above



Refurbishment plate



Bolt missing from manway/cover flanged connection

Overview of North head showing nozzle and coating failure

Final Sign Off	In-Service Inspector	Reviewed	Owner Representative
Name	Ian Fong	Brian Pretty	
Sign			
Date	December 13, 2020	15 December, 2020	
Copied To:			