

1 Q. **Re: NLH Reply to GRK Motion to Order more Complete Responses (Jan. 14), p. 5**

2 **Citation:**

3 Regarding the 2nd bullet, in its response Hydro referred, as noted by the GRK in its  
4 Supplemental Motion, to Order P.U. 41's statement that it would not be relevant or  
5 useful in this proceeding to require the production of detailed technical information  
6 in relation to physical risks associated with the Muskrat Falls development and then  
7 cross referenced to Hydro's response to GRK-NLH-044. As noted above, Hydro's  
8 response to GRK-NLH-044 specifically describes in detail the options available to  
9 Hydro in the very unlikely event of a dam breach at Muskrat Falls. Other than to  
10 consider a potential dam breach at Muskrat Falls to be very unlikely, Hydro has not  
11 assigned a forced outage probability to "events concerning the integrity of the MF  
12 reservoir". Hydro likewise does not assign a forced outage probability to  
13 catastrophic events concerning the integrity of any of its dams. Hydro notes that  
14 the Muskrat Falls dam is being designed similar to all other Hydro dam facilities so  
15 that the probability of risk of failure is negligible.

16 Preamble: The last sentence is ambiguous. It could be interpreted to mean either:

17 a) Hydro notes that the Muskrat Falls dam is being designed similar to all other  
18 Hydro dam facilities ~~so that~~ and therefore the probability of risk of failure is  
19 negligible; or

20 b) Hydro notes that the Muskrat Falls dam is being designed, like ~~similar to~~ all  
21 other Hydro dam facilities, such ~~so~~ that the probability of risk of failure is  
22 negligible.

23 Please indicate which of the two possible meanings of the last sentence of the  
24 Citation is correct. If neither is correct, please clarify the meaning of this sentence.

25 Please confirm that Hydro does not assign a forced outage probability of zero to  
26 catastrophic events concerning the integrity of its dams.

1     A.     Hydro disagrees that the sentence in question is ambiguous. The intent ascribed to  
2           the sentence is its plain meaning:

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4                     Hydro notes that the Muskrat Falls dam is being designed similar  
5                     to all other Hydro dam facilities so that the probability of risk of  
6                     failure is negligible.

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8           The design principles for dam engineering design are sufficiently conservative that,  
9           consistent with all of Hydro's water retaining structures, the probability of an  
10          outage resulting from a dam failure to be used in a reliability study is negligible.