

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. (underlining added)  
16 On what basis was it determined that "a potential dam breach at Muskrat Falls [is]  
17 very unlikely"? Please provide all supporting documentation leading to this  
18 conclusion.

19  
20  
21 A. The determination is based on Hydro's understanding of the principles associated  
22 with the engineering design of large-scale dams. See also Hydro's response to GRK-  
23 NLH-098. This review does not include a review of detailed technical and  
24 engineering information associated with the Muskrat Falls project. Hydro's  
25 responses to GRK-NLH-044, GRK-NLH-096 and GRK-NLH-097 deal with the options  
26 available to Hydro in the very unlikely event of a dam breach at Muskrat Falls.