

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 "the probability of risk of failure is
17 negligible"? Please provide all supporting documentation leading to this conclusion.

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20 A. Please refer to Hydro's response to GRK-NLH-099.