

1 Q. **Reference: Application Rev. 1, Volume 2, Inspect Chemical Tanks - Holyrood**

2 a. It is stated (page 3) *“Liquid Storage Tanks containing hazardous materials are required by*
3 *API and ASME Codes to be inspected every ten years. The last inspection took place in 2010*
4 *...”*. Because an inspection will not take place in 2020, is Hydro in violation of the API and
5 ASME Codes?

6 b. For the recommended Alternative 3, what is the probability that the inspection will result in
7 a scenario where the chemical storage tanks would not be returned to service in time for
8 the winter of 2021/22?

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11 A.

12 a. The statement in the capital budget proposal that refers to the API and ASME codes, *“Liquid*
13 *Storage Tanks containing hazardous materials are required by API and ASME Codes to be*
14 *inspected every ten years,”* is intended to provide a frame of reference for typical inspection
15 intervals for storage vessels containing hazardous materials. The ASME code deals with
16 boilers and pressure vessels while the API code addresses petroleum related products. The
17 Holyrood chemical tanks are not pressure vessels and do not fall under the scope of either
18 of these codes. Therefore, Hydro is not in violation of these codes.

19 The contractor that completed the previous inspection in 2010 provided a recommendation
20 for the tanks be re-inspected in 2020, which is consistent with the above referenced codes.
21 Hydro will be outside of this recommendation for the 2020–2021 operating season.

22 b. A scenario in which the chemical storage tanks could not be returned to service in time for
23 winter 2021–2022 is considered highly unlikely. Damaged sections can be repaired or
24 replaced in relatively short time. Replacement material can be obtained in advance and be
25 ready for installation when the tanks are opened and made safe for entry.