

1 Q. **Refurbishment of Day Tank.**

2 With reference to the 2022 CFM report (Schedule 1, Attachment 3), would CFM be able to
3 provide its opinion on the quantitative risk of failure of the Day Tank, if the recommended
4 inspection date was delayed to August 2024 (on the assumption that the Holyrood TGS is
5 extended beyond March 31, 2024)?

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8 A. As indicated in the calculation provided in Newfoundland and Labrador Hydro's ("Hydro")
9 response to IC-NLH-003, Attachment 1, the tank floor will be below the minimum thickness of
10 0.1 inches as per API 653¹ by 2023. It is CFM's opinion that the floor is at an elevated risk of
11 failure. CFM has indicated to Hydro that it will not accept the liability for this tank beyond the
12 previously-identified next inspection interval date presented in the 2013 Team Industrial
13 Services API² report.

¹ *Tank Inspection, Repair, Alteration, and Reconstruction*, API Standard 653, 2014.

² American Petroleum Institute ("API").