

1 **Q. Re: Rocky Pond Plant Refurbishment (p. 2 of 81, Schedule B) - In the evaluation of**
2 **the replacement of the woodstave penstock, how is the risk to employee and public**
3 **safety determined?**
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5 A. The assessment of the risk to employee and public safety is a matter of judgment.
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7 The woodstave penstock is approximately 756 m long and runs from the forebay dam to
8 the powerhouse and, at one point crosses under a bridge on Beachy Cove Road. Beachy
9 Cove Road is utilized on a daily basis by the general public to reach homes and cabins in
10 the immediate area and is also used by Newfoundland Power employees to access the
11 plant and upstream control structures.
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13 A major leak, similar to the leak experienced on March 8, 2008, could develop at any
14 time. Should a major leak or blowout develop, washouts may occur on the road near the
15 bridge affecting cabin owners in the immediate area. If the major leak or blowout occurs
16 further downstream it could damage the powerhouse and substation. Such events would
17 present a risk to safety of employees or members of the public should they be travelling
18 in the area at the time of the penstock failure.
19

20 Finally, penstocks in the condition of the Rocky Pond penstock require that leaks be
21 plugged on a regular basis. There is potential for serious injury to employees should a
22 major blowout of the penstock occur while repairs are being made.