

1 Q. Reference: At page 36 of the report, Liberty states “Based on information available
2 at the time, Hydro did not act reasonably in protecting the equipment”.
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4 Please specify what information Liberty believed Hydro had available at the time
5 when Hydro protected the equipment.
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8 A. As a matter of clarification, please understand that use of the waterproof covers for more
9 than several days does not, in Liberty’s view comprise what can be defined as protecting
10 the equipment. The information that Hydro had available at the time it determined to use
11 the covers was that extending such use past a period of several days would risk
12 damaging water contact. This information in turn made clear the need for supplemental
13 action, which Hydro failed to take.
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15 Hydro should have known that it was critical to assure that moisture in air in an air blast
16 circuit breaker must be very low (in the range of 10 parts per million), both to prevent
17 mechanical seizing of the mechanism and to prevent the possibility of an explosion
18 caused by insulation failure. In its response to a Liberty RFI (PR-PUB-NLH-067), Hydro
19 indicated that it “was aware that it was important to ensure that no water from the
20 weather (such as snow and rain) should be allowed to enter the tank.” Hydro did not take
21 prudent action, as explained in Liberty’s response to the preceding RFI (PR-PUB-NLH-
22 004) to assure that the breaker receiver tank was free of water before its reassembly.