Q. **Re: Holyrood: Upgrade Unit 2 Stack Breeching (Tab 7)**

At page 15, section "Stack Breeching Ducts", a 2010 testing for thickness revealed material loss up to 30 percent. Why is this minimal loss considered grounds for repairing the Stack Breeching in circumstances when the conditions which are said to have caused the loss (p. 15) have ceased?

A. A material loss of 30 percent in the wall thickness of the breeching steel casing is not considered to be minimal. Hatch recommended in their report, *Unit 2 Airheater to Stack Ducting, Dec. 14, 2010* , provided in Appendix B of the report filed in the Application, that Hydro repair or replace steel plates of the stack casing in areas where thickness readings were found to be less than or equal to 0.20 inches (20 percent material loss). There are a number of locations where plate thickness is less than 0.20 inches and some locations where holes through the plates exist. As it pertains to the steel casing, this breeching refurbishment project plans to patch only those areas where steel plate thickness has been reduced by 20 percent or greater as recommended by Hatch.

On page 15 of the report filed in the 2012 Application it says that past operating conditions that facilitated the formation of corrosion inside the stack breeching ducts have been corrected. These operating conditions relate to the temperature of the boiler flue gases passing through the breeching. Although operating temperatures have been improved with resultant improvement in corrosion rates, accelerated corrosion to the steel casing will still occur in areas where deteriorated insulation exists as it would facilitate the formation of corrosive condensate where the flu gas comes into contact with cool exposed interior steel duct surfaces. In

areas where the insulation system is in poor condition accelerated corrosion will take place regardless of improved operating temperatures.