$\circ$	Hagrada	Hait 1	Ctack	<b>Breeching</b>
u.	Opgrade	Ouit T	Stack	breeching

maintenance costs for 2006.

In evaluating Alternative 3 the annual O&M cost was estimated to be \$49,391, using the average of the 11-year maintenance history of the Unit 1 stack breeching as shown in Table 1, page 9 of the report: "Upgrade Unit 1 Stack Breeching, Holyrood Thermal Generating Station, July 2011".

Please calculate, over the same 11-year period, the average annual cost for maintenance of the Unit 1 Stack Breeching to exclude anything other than normal

Α.

The maintenance history for the Unit 1 stack breeching in 2006 (see response to PUB-NLH-1) included scaffolding erection, steel casing repairs and painting, concrete floor replacement, and internal insulating block repairs. The concrete floor replacement is not normal maintenance on the Unit 1 stack breeching. If the cost of the concrete floor maintenance (\$30,000) is removed in 2006, the recalculated average 11-year maintenance cost on the stack breeching is \$46,663. It should be noted that in 2006, approximately 760 square feet of internal insulating block was replaced which represents the majority of the maintenance cost (\$261,410) for that year. Internal insulating block replacement is considered as normal maintenance completed on the stack breeching. However, the amount of internal insulating block replaced in 2006 was much larger as compared to the other years considered in the maintenance history. In 2006, scaffolding was erected throughout the breeching enabling a detailed internal inspection which indicated that extensive replacement was required.