

Review Comment Table

Board:	WLWB
Review Item:	NTPC - Request to Revise DSR Frequency (N1L4-0150 and W2014L4-0001) (WLWB)
File(s):	N1L4-0150 W2014L4-0001
Proponent:	Northwest Territories Power Corporation
Document(s):	Request to Revise DSR Frequency 0.04 MB Table - 2011 DSR Recommendation Status Update 0.2 MB NTPC Email Correspondence with MECO 0.2 MB
Item For Review Distributed On:	Feb 11 at 17:02 Distribution List
Reviewer Comments Due By:	Mar 3, 2016
Proponent Responses Due By:	Mar 10, 2016
Item Description:	<p>On January 21, 2016 Northwest Territories Power Corporation (NTPC) submitted a request to revise the frequency of Dam Safety Reviews (DSRs) for Water Licenses N1L4-0150 and W2014L4-0001. Part C, Item 13 (N1L4-0150) and Part C, Item 6 (W2014L4-0001) require the Licensees to conduct a Dam Safety Review of all Power Generation Facilities every five years "or unless otherwise approved by the Board". NTPC has requested the Board approve the decrease in the frequency of DSRs at Snare from every five to every seven years, consistent with the Canadian Dam Safety Guidelines.</p> <p>Board staff notified the distribution list of this request and asked reviewers to notify the Board if they felt a public review was necessary. No requests were received however Board staff believe that new information provided in the 2015 Flood Risk Analysis Study warrant a public review of this request. The 2015 Flood Risk Analysis provides an update on the status of previous Dam Safety Review recommendations.</p> <p>In response to this new information, Board staff reviewed the 2011 Dam Safety Review report and identified 20 of the original 46 items were considered "outstanding" or not included in the Flood Risk Analysis Study. On February 10, 2016 NTPC provided an updated response to each outstanding DSR recommendation; the responses provided by NTPC are included in the attached table. The Board encourages reviewers to provide comments and recommendations in response to this request prior to the deadline.</p>
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Comment Summary

WLWB: Meghan Schnurr			
ID	Topic	Reviewer Comment/Recommendation	Proponent Response
1	DSR Recommendation Implementation History	<p>Comment: This public review was initiated when new information regarding the implementation of DSR recommendations was identified. NTPC provided Board staff with an update on the status of all recommendations. In review of this update, Board staff have identified that:</p> <ul style="list-style-type: none"> (i) 26 recommendations were completed within the timeline for completion; (ii) ten (10) recommendations were completed after the deadline; and (iii) ten (10) recommendations are still outstanding and have past their respective deadlines. <p>Please note Board staff's review used the priorities and deadlines identified in the 2011 DSR, as there was some discrepancy with the data provided in the Flood Risk Analysis Study.</p> <p>Recommendation: When the Board considers NTPC's request to reduce the frequency of DSRs, how does NTPC believe the Board should consider NTPC's track record regarding DSR follow-up? Does NTPC believe that its track record should influence the Board's decision, and if so how? If the</p>	<p>Mar 14: Question 1) With 36 recommendations completed, NTPC takes Dam Safety seriously and is working diligently to clear the final 10 outstanding recommendations. Additionally, NTPC is grateful for the efforts of the Board and Inspectors in facilitating compliance and entertaining meetings with NTPC. Acknowledging that NTPC's track record for DSR follow-up is necessary to consider in the context of adjustments to the DSR frequency, NTPC also asks the Board to consider NTPC's track record in relationships with Board staff and Inspectors. NTPC takes pride in maintaining positive interactions with the Board and Inspectors. Going forward NTPC will be making significant efforts (detailed below) to improve the timeliness of DSR follow-up.</p> <p>Question 2) NTPC believes that the track record for response to recommendations should influence the Board's decision in the following three ways:</p> <p>a.) Learning Opportunities: Since the 2011 DSR recommendations NTPC has been noticing delays in responses, missed deadlines, and a lack of established responsibility pertaining to Water License and Land-Use Permit compliance. Though this track-record exhibits a less than ideal compliance history it has prioritized action from on NTPC on improvement and active management of the causes for this compliance history.</p> <p>b.) Reduced Frequency, Increase Resources: In addition to issues of established responsibility (cited above), a lack of resources also contributed to NTPC's track record on the 2011 DSR recommendations. With a reduced DSR frequency comes an increase in available time and resources to address recommendations from regular DSRs. In other words, if the DSR frequency was reduced to reflect the risk posed by</p>

		<p>Board approves NTPC's request for reduced DSR frequency, what assurance does the Board have that NTPC will improve the timeliness of DSR follow-up?</p>	<p>Snare Hydro as defined in the Canadian Dam Safety Guidelines, NTPC would have more time and resources to address current Dam Safety Recommendations.</p> <p>c.) Relationship establishment: Despite the outstanding recommendations and missed deadlines, NTPC's maintenance of positive relationships with the Board and its Inspectors has been proven through this process. Most recently, NTPC met with the Inspector and WLWB regulatory staff on February 8, 2016 to discuss timelines, compliance, and compare 2011 DSR recommendations with the 2015 Flood Risk Analysis Study. The meeting was positive and resulted in newly established timelines for compliance with outstanding recommendations.</p> <p>Question 3) In summary, NTPC assures the Board that, regardless of approval to reduce the DSR frequency, there is a plan in place to improve the timeliness of DSR follow-up. That plan, is as follows:</p> <p>a) Outstanding DSR Recommendations: Correct outstanding 2011 DSR items in accordance with the timeline established following the meeting of February 8, 2016.</p> <p>b) Environmental Regulatory Specialist: NTPC will be hiring a regulatory specialist before April 30, 2016 that will be responsible for facilitating compliance on various NTPC licenses including the Water Licenses that require periodic Dam Safety Reviews. This will improve organization and establish responsibility internally to ensure timely compliance going forward. c) Relationship maintenance: NTPC will continue to place high priority on maintenance of relationships with Board staff and Inspectors to ensure 100% compliance is achieved in a timely manner.</p>
2	Regular Updates	<p>DSR Comment: Currently, the Board does not formally require NTPC to update the Board on NTPC's DSR follow-up activities. However, given that NTPC has not always met DSR recommendations within the timelines set by the review engineer, the Board may be</p>	<p>Mar 14: (a) NTPC agrees with this recommendation and believes that provision of a regular update to Board staff and the Inspector on outstanding DSR recommendations would be an excellent tool to facilitate timely compliance.</p>

	<p>interested in receiving updates. Board staff together with GNWT Inspectors, recently met with the NTPC to review the status of 2011 DSR recommendations. Board staff found this meeting to be productive and clarified the status of DSR recommendations. This type of meeting could prove to be a useful method to update Board staff and Inspectors on DSR recommendations in the future. Alternatively, the Board may wish to consider requiring an update via the Annual Report (pursuant to N1L4-0150 Part B, item 1(m) or W2014L4-0001 Schedule 1, Item 1(i)).</p> <p>Recommendation: Please comment on the following:</p> <p>(a) Does NTPC believe it would be useful to provide Board staff and the Inspector with a regular update on the status of DSR recommendations in addition to the implementation plan; and if so,</p> <p>(b) How would this update most effectively be conducted (e.g., Annual Report, informal meetings etc.)?</p>	<p>(b) NTPC believes that an update as part of the Annual Report and bi-annual informal meetings, with additional meetings as necessary would be useful to meet timelines set by the review engineer. These would also prove beneficial in maintenance of positive relationships between the Board, Inspectors, and NTPC.</p>
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