

Data Request 2 – GHE Responses

DR2-1 General Question

Is there an anticipated timeline for how long installation of the Advance Gas Path (AGP) would take?

The installation of AGP requires the unit be offline, and if completed as a standalone work scope, would take 16 days/unit (+/- 1day). However, AGP will be installed during the annual maintenance outage at Grays Harbor, which next year will be approximately 45 days, in order to complete the scheduled Major Inspection (required maintenance every 24,000 operating hours). The installation of AGP will have no impact on the outage duration.

DR2-2 SEPA Checklist, General Question

The SEPA checklist speaks to AGP installation only. Please provide an explanation for not including information related to the construction of Units 3 & 4.

GHE apologizes for any confusion. GHE intended the SEPA Checklist to cover both the AGP installation and the request to extend the construction deadline for Units 3 and 4. In our view, a decision by the Council to extend the deadline for commencing construction of Units 3 and 4 would not by itself have any adverse environmental impacts, so there were no impacts to discuss in the SEPA checklist. If it would be helpful, GHE could submit a revised SEPA Checklist stating this point more clearly.

In 2010, the Council recommended that the SCA be amended to authorize construction and operation of Units 3&4, and the Governor executed that amendment in 2011. As part of EFSEC's process, GHE submitted detailed information regarding the environmental impacts that would be associated with constructing and operating Units 3&4, and the Council considered that information and conducted a series of public hearings, where technical experts made presentations and responded to questions. EFSEC also performed a SEPA analysis and ultimately issued a Mitigated Determination of Non-Significance. The environmental impacts associated with the construction and operation of Units 3&4 were fully evaluated in this process. Extending the construction deadline would not result in any environmental impacts that the Council has not already considered.

It is also worth noting that amendment of the SCA to extend the deadline for commencing construction will not by itself allow GHE to proceed with construction of Units 3&4. Rather, when the Council amended the SCA in 2010-11 to allow the construction of Units 3&4, it considered the possibility that construction might not be commenced right away and spelled out a process of further review. If GHE wanted to begin construction more than 5 years after the amendment, it would be subject to the requirements found in SCA Article II.B.2., which ensure evaluation of the current environmental conditions and regulations before the Council authorizes construction to proceed. Specifically, this section of the SCA requires GHE to "certify that the representations in the application, environmental conditions, pertinent technology and regulatory conditions remain current and applicable, or identify any changes and propose appropriate revisions in the Site Certification Agreement to address changes." The SCA provides that the Council will consider this information and only "upon the Council's finding that no changes to the Site Certification

Agreement are necessary or appropriate, or upon the effective date of any necessary or appropriate changes to the Site Certification Agreement” will the Council authorize construction to proceed. Amending the SCA to extend the construction deadline would not change these provisions. If and when GHE wishes to commence construction, it will have to go through this process and the Council will decide whether to authorize construction. Accordingly, the extension itself will have no environmental impacts that would be identified in the SEPA Checklist.

DR2-3 SEPA Checklist, Environmental Health 7.a.3

The checklist states, “Equipment replacement will not require the use of more than de minimis amounts of toxic or hazardous chemicals.” Are the chemicals to be used already covered in the existing site SPCC and Hazardous Waste management plans?

Yes. De minimis amounts of toxic or hazardous chemicals, i.e. solvents, oils, etc., are routinely used chemicals and are already covered in the existing site SPCC Plan and Dangerous Waste Management Procedure.