### CPUC AUDIT FINDINGS OF OTAY MESA ENERGY CENTER SEPTEMBER 18 – SEPTEMBER 22, 2023

#### I. Findings

#### Finding 1: The Plant does not have

#### in its Emergency Response Plan.

#### General Order (GO) 167-B, Appendix E, Operation Standard (OS) 1: Safety states:

"The protection of life and limb for the work force is paramount. GAOs have a comprehensive safety program in place at each site. The company behavior ensures that personnel at all levels of the organization consider safety as the overriding priority. This is manifested in decisions and actions based on this priority. The work environment and the policies and procedures foster such a safety culture, and the attitudes and behaviors of personnel are consistent with the policies and procedures."

#### GO 167-B, Appendix E, OS 12: Operation Conduct states:

To ensure safety, and optimize plant availability, the GAO conducts operations systematically, professionally, and in accordance with approved policies and procedures. The GAO takes responsibility for personnel actions, assigns personnel to tasks for which they are trained, and requires personnel to follow plant and operation procedures and instructions while taking responsibility for safety.

A. All personnel follow approved policies and procedures. Procedures are current, and include a course of action to be employed when an adopted procedure is found to be deficient.

GO 167-B, Appendix E, OS 20: Preparedness for On-Site and Off-Site Emergencies states in part:

"The GAO plans for, prepares for, and responds to reasonably anticipated emergencies on and off the plant site, primarily to protect plant personnel and the public, and secondarily to minimize damage to maintain the reliability and availability of the plant. Among other things, the GAO: [...]

A. Plans for the continuity of management and communications during emergencies, both within and outside the plant,"

Emergency Response Plan (ERP) require

the plan. The Otay Mesa Energy Center (OMEC) did not have

the Plant's ERP. The Plant's ERP is not meant to be a standalone document. It is intended to be used in conjunction with other Federal and State agencies' emergency response plans, standard operation procedures, and other pertinent documents. It is important to ensure that emergency responders are aware of their assigned roles and responsibilities during emergency situations. The

will establish and increase accountability, readiness, communication, and adaptation for OMEC-specific emergency situations.

The Plant management must initiate and implement formal

In addition, OMEC needs to update the whenever the Plant's ERP is revised.

# Finding 2: ERP for the Plant contains an inconsistency in the location of the first response trauma bag.

GO 167-B, Appendix E, OS 1: Safety states:

"The protection of life and limb for the work force is paramount. GAOs have a comprehensive safety program in place at each site. The company behavior ensures that personnel at all levels of the organization consider safety as the overriding priority. This is manifested in decisions and actions based on this priority. The work environment and the policies and procedures foster such a safety culture, and the attitudes and behaviors of personnel are consistent with the policies and procedures."

GO 167-B, Appendix E, OS 20: Preparedness for On-Site and Off-Site Emergencies states in part:

"The GAO plans for, prepares for, and responds to reasonably anticipated emergencies on and off the plant site, primarily to protect plant personnel and the public, and secondarily to minimize damage to maintain the reliability and availability of the plant. Among other things, the GAO: [...]

C. Ensures provision of emergency information and materials to personnel."

While reviewing OMEC's ERP, Electric Safety and Reliability Branch (ESRB) staff observed a discrepancy in Appendix A, which indicated the presence of a first response trauma bag

However, upon inspection, only a first aid kit was found The Plant must address the discrepancy to ensure the accurate location of the emergency response equipment.

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#### GO 167-B, Appendix E, OS 1: Safety states:

"The protection of life and limb for the work force is paramount. GAOs have a comprehensive safety program in place at each site. The company behavior ensures that personnel at all levels of the organization consider safety as the overriding priority. This is manifested in decisions and actions based on this priority. The work environment and the policies and procedures foster such a safety culture, and the attitudes and behaviors of personnel are consistent with the policies and procedures."

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"The GAO plans for, prepares for, and responds to reasonably anticipated emergencies on and off the plant site, primarily to protect plant personnel and the public, and secondarily to minimize damage to maintain the reliability and availability of the plant. Among other things, the GAO: [...]

C. Ensures provision of emergency information and materials to personnel."

ESRB staff observed that the Plant's emergency lights were not working at

None of the three emergency lights

operational during the audit. This is an indication of a lack of inspection and maintenance activities.

National Fire Protection Association (NFPA) 101 chapter 7.9 states

"Emergency illumination shall be provided for a minimum of 90 minutes in the event of failure of normal lighting. Illumination must not be less than an average of 1 footcandle along the path of egress at floor level".

The Plant management must conduct routine inspection and maintenance of all emergency lights at the Plant and keep their records to ensure personnel safety and emergency preparedness.

were



# Finding 4: OMEC did not review and recertify its procedures according to its requirements.

GO 167-B, Appendix E, OS 1: Safety states:

"The protection of life and limb for the work force is paramount. GAOs have a comprehensive safety program in place at each site. The company behavior ensures that personnel at all levels of the organization consider safety as the overriding priority. This is manifested in decisions and actions based on this priority. The work environment and the policies and procedures foster such a safety culture, and the attitudes and behaviors of personnel are consistent with the policies and procedures."

#### GO 167-B, Appendix E, OS 12: Operation Conduct states:

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A. All personnel follow approved policies and procedures. Procedures are current and include a course of action to be employed when an adopted procedure is found to be deficient.

ESRB staff identified that OMEC did not review and recertify the	
and	according to its
requirements.	
OMEC's	
	· · · · · · · · · · · · · · · · · · ·

specifies what should be verified to ensure

compliance with the standard along with the review frequency and recertification process. The

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the system. The Plant management must re	eview the to verify its accuracy
according to	nd recertify it by completing
ESRB staff also observed that the Plant sta	aff diligently complied with the
	. The purpose of
the	is to perform the necessary pre-job due
diligence, on-the-job oversight, and post-jo	bb follow-up to prevent risk for incidents while
It is cru	icial for achieving the purpose of the standard to
maintain and provide the latest information	n to workers who are continuously exposed to the
chemicals while handling the chemicals. H	lowever, the Plant'
has not been reviewed and revise	d since
The Plant management must perform period	odic review of the procedure
	and update it with the latest
relevant information and revision records.	

standard was only reviewed and recertified in the year **since** the year **since**. It is necessary to perform periodic review and update all applicable standards to ensure safety and reliability of

#### Finding 5: The Plant did not demonstrate remedial activities on repeated failure.

#### GO 167-B, Appendix E, OS 8: Plant Status and Configuration states:

Station activities are effectively managed so plant status and configuration are maintained to support safe, reliable and efficient operation.

### GO 167-B, Appendix D, Maintenance Standard (MS) 3: Maintenance Management and Leadership states:

Maintenance managers establish high standards of performance and align the maintenance organization to effectively implement and control maintenance activities.

#### GO 167-B, Appendix D, MS 4: Problem Resolution and Continuing Improvement states:

The company values and fosters an environment of continuous improvement and timely and effective problem resolution.

#### GO 167-B, Appendix D, MS 9: Conduct of Maintenance states:

Maintenance is conducted in an effective and efficient manner so equipment performance and materiel condition effectively support reliable plant operation.

ESRB staff ident	tified multiple failure incide	ents	
Three	failure incidents took place		and four
failure incidents		respectively since year	During the audit,
the Plant did not	demonstrate root cause analysis	and remedial activities to	mitigate the repetitive
failure	These repetitive failure	es	can compromise

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safety and reliability and cause prolonged downtimes. Specifically, three outages took place in the **should** have demonstrated its best reliability for power grid stability. It is critical for safety and reliability to ensure the integrity **should** which are constantly exposed to extremely high temperatures, high pressures, and load cycling. The Plant must take actions for assessment and engineering disposition to evaluate activities for operation and maintenance and failure mechanism on **should** and implement remedial actions.

Failure Incidents

Finding 6: Excessive Oil leaking

#### GO 167-B, Appendix D, MS 1: Safety states in part:

"The protection of life and limb for the work force is paramount. GAOs have a comprehensive safety program in place at each site. The company behavior ensures that personnel at all levels of the organization consider safety as the overriding priority. This is manifested in decisions and actions based on this priority..."

#### GO 167-B, Appendix D, MS 9: Conduct of Maintenance states:

"Maintenance is conducted in an effective and efficient manner so equipment performance and materiel condition effectively support reliable plant operation."

#### GO 167-B, Appendix E, OS 8: Plant Status and Configuration states:

"Station activities are effectively managed so plant status and configuration are maintained to support safe, reliable and efficient operation."

#### GO 167-B, Appendix E, OS 10: Environmental Regulation Requirements states:

Environmental regulatory compliance is paramount in the operation of the generating asset. Each regulatory event is identified, reported and appropriate action taken to prevent recurrence.

#### GO 167-B, Appendix E, OS 13: Routine Inspections states:

"Routine inspections by plant personnel ensure that all areas and critical parameters of plant operations are continually monitored, equipment is operating normally, and that routine maintenance is being performed. Results of data collection and monitoring of parameters during routine inspections are utilized to identify and resolve problems, to improve plant operations, and to identify the need for maintenance."

1) ESRB staff observed excessive oil leaks

. OMEC ha	as
	respectively. ESRB staff
observed active oil leaks on multiple	and oil contamination on
	and gravel and soil of the

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ground
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	The
are not constructed with secondary contain	nments to protect the surrounding
environment from oil contamination. Thus, leake	ed oil seeps into the ground
and contaminates equipment as	well. The Plant management must
develop mitigation plans to prevent oil leaks from	and review the
existing	to include countermeasures
of the continuous oil leaks and contamination	in accordance with
A	lso, the Plant must develop a disposal
plan of impacted soil and oil-contaminated mater	rial according to and
document relevant activities such as sampling, and	nalysis, transportation, and disposal per
applicable regulations. Specifically, OMEC need	s to evaluate if it requires to implement
accordance	with California Health and Safety Code
for handling continuous oil leaks and contaminat	tion from

2) ESRB staff identified oil leaks



Figure 2: Leaked oil contaminated

Thick oil stains cover the entire **and penetrate out of the enclosure** cabinet. The Plant must correct the leak source and remove oil stains **and penetrate out of the enclosure** All known equipment deficiencies must be entered into the work management system in a timely manner to ensure all issues are documented, tracked, and corrected.



### Finding 7: High temperature water leaking from multiple locations

#### GO 167-B, Appendix E, OS 8: Plant Status and Configuration states:

"Station activities are effectively managed so plant status and configuration are maintained to support safe, reliable and efficient operation."

#### GO 167-B, Appendix D, MS 3: Maintenance Management and Leadership states:

"Maintenance managers establish high standards of performance and align the maintenance organization to effectively implement and control maintenance activities."

#### GO 167-B, Appendix D, MS 4: Problem Resolution and Continuing Improvement states:

*"The company values and fosters an environment of continuous improvement and timely and effective problem resolution."* 

#### GO 167-B, Appendix D, MS 9: Conduct of Maintenance states:

*"Maintenance is conducted in an effective and efficient manner so equipment performance and materiel condition effectively support reliable plant operation."* 

ESBR staff observed water leaking from

These high pressure and high temperature steam and water leaks pose safety hazards to workers and may cause subsequential damages to adjacent equipment and structures. The Plant must correct the leaks on the timely manner to eliminate potential safety hazards and equipment damage.



#### Finding 8: The Plant employees' forklift certifications expired.

#### GO 167-B, Appendix E, OS 1: Safety states:

"The protection of life and limb for the work force is paramount. GAOs have a comprehensive safety program in place at each site. The company behavior ensures that personnel at all levels of the organization consider safety as the overriding priority. This is manifested in decisions and actions based on this priority. The work environment and the policies and procedures foster such a safety culture, and the attitudes and behaviors of personnel are consistent with the policies and procedures."

#### GO 167-B, Appendix E, OS 3: Training Support states:

A systematic approach to training is used to achieve, improve, and maintain a high level of personnel knowledge, skill, and performance. Each GAO provides a site-specific training program including on-the-job training, covering operations, including reasonably anticipated abnormal and emergency operations. Personnel are trained commensurate with their duties.

#### GO 167-B, Appendix E, OS 5: Operations Personnel Knowledge and Skills states:

Operations personnel are trained and qualified to possess and apply the knowledge and skills needed to perform operations activities that support safe and reliable plant operation.

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During the audit, ESRB staff identified that nine employees' forklift certifications have expired. In accordance with the OSHA standard 29 CFR 1910.178(1)(6), employers must certify that each operator has been trained and evaluated to operate forklifts. The OSHA standard 29 CFR 1910.178(1)(1)(i) also states the employer shall ensure that each powered industrial truck operator is competent to operate a powered industrial truck safely, as demonstrated by the successful completion of the training and evaluation specified in the standard. The Plant management must arrange trainings in a timely manner for the employees to provide proper training and recertification. The certification shall include the name of the operator, the date of the training or evaluation.

#### <u>Finding 9: The Plant failed to report an incident and outage to the California Public</u> <u>Utilities Commission (CPUC).</u>

#### GO 167-B, Appendix E, OS 12: Operation Conduct states:

To ensure safety, and optimize plant availability, the GAO conducts operations systematically, professionally, and in accordance with approved policies and procedures. The GAO takes responsibility for personnel actions, assigns personnel to tasks for which they are trained, and requires personnel to follow plant and operation procedures and instructions while taking responsibility for safety.

*B.* All personnel follow approved policies and procedures. Procedures are current, and include a course of action to be employed when an adopted procedure is found to be deficient.

During the audit, ESRB staff identified that	had a			
failure in and returned to service in	The Plant underwent significant			
maintenance works, replacing the	during the outage. In			
accordance with GO 167-B Section 10.4, the in	cident was a reportable incident to the CPUC but			
OMEC failed to report the incident. OMEC als	did not report an outage of			
which occurred on	to the CPUC according to CPUC reporting			
guideline. The Plant must develop incident reporting procedures, train responsible employees to				
comply with reporting requirements of GO 167	-B, and submit all reportable incidents to the			
CPUC in a timely manner.				

### Finding 10: Washed-out and damaged concerns.

is causing physical security

#### GO 167-B, Appendix E, OS 21: Plant Security states:

"To ensure safe and continued operations, each GAO provides a prudent level of security for the plant, its personnel, operating information and communications, stepping up security measures when necessary."

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Sections of the These	compromise the Plant's p	are washed-out and damaged.
Plant.	The Plant must repair the	to enhance the physical security of the

Figure 5: Damaged and washed-out



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#### Finding 11: The Plant's hot work permit does not comply with NFPA 51B.

#### GO 167-B, Appendix E, OS 1: Safety states:

"The protection of life and limb for the work force is paramount. GAOs have a comprehensive safety program in place at each site. The company behavior ensures that personnel at all levels of the organization consider safety as the overriding priority. This is manifested in decisions and actions based on this priority. The work environment and the policies and procedures foster such a safety culture, and the attitudes and behaviors of personnel are consistent with the policies and procedures."

#### NFPA 51B 5.6.1.1 states:

"A fire watch shall be maintained for 1 hour after completion of hot work operations to detect and extinguish smoldering fires."

ESRB staff noted that OMEC's current hot work permit specifies a 30-minute post-work fire watch duration, which does not align with NFPA 51B 5.6.1.1 requirements mandating a 1-hour fire watch following hot work completion. The Plant must update their hot work permit to adhere to NFPA 51B standards.

#### Finding 12: The Plant has no varnish analysis records for the

#### GO 167-B, Appendix D, MS 9: Conduct of Maintenance states:

"Maintenance is conducted in an effective and efficient manner, so equipment performance and material condition effectively support reliable Plant operation."

While reviewing **and the second secon** 



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#### Finding 13: The Plant lacks evacuation drill practice and instructions.

GO 167-B, Appendix E, OS 1: Safety states:

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# GO 167-B, Appendix E, OS 20: Preparedness for On-Site and Off-Site Emergencies states in part:

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#### B. Trains personnel in the emergency plan periodically..."

ESRB staff observed that the Plant had e addition, the	vacuation drill records for only highlighted issues with the	In
While the OMEC ERP designates	s the	of the Plant as the
primary assembly location, the critique reconfused and went to	evealed that during the drill, many en istead of the designated assembly are	nployees became a.
The Plant must conduct evacuation evacuation trained in response to an emergency evacuation	on drills, maintain drill records, and e cuation. Additionally, the Plant must	nsure staff are well address the
during emergencies.	is criti	ical for staff safety

Furthermore, the Plant must ensure that all staff have a solid understanding of the OMEC Emergency Response Plan and all the designated assembly locations in the event of an emergency evacuation.

Finding 14: The

be made compliant with GO 167-B.

fire suppression system needs to

#### GO 167-B, Appendix E, Guidelines for OS 28: Equipment and Systems states in part:

"GAO complies with these Operation Standards (1-27) considering the design bases (as defined in the Appendix) of plant equipment and critical systems. The GAO considers the design basis of power plant equipment when as required by other standards it, among other things:

Z. Fire Protection System

f. Fire Protection Equipment Markings

1. Locations employing low-pressure and high-pressure water systems clearly differentiate each system.

2. Fire protection equipment, including but not limited to fire blanket boxes, pumps, hose locations, hydrants, sirens, and extinguishers, are painted red."

ESRB staff noted the absence of proper demarcation on the fire suppression systems The lack of adequate demarcation poses a risk to the integrity of the fire suppression system as non-Plant personnel and contractors may inadvertently interfere with the fire suppression piping during maintenance. The Plant must develop a plan to provide labels on the fire suppression systems to help identify them.

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1)	with an unlabeled fire suppression system.
Figure 7:	with an unlabeled fire suppression system
Ũ	
2)	with an unlabeled fire suppression system.
2)	with an unlabeled fire suppression system.
2)	with an unlabeled fire suppression system.
2)	with an unlabeled fire suppression system.
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2)	with an unlabeled fire suppression system.
2)	with an unlabeled fire suppression system.
2)	with an unlabeled fire suppression system.
2)	with an unlabeled fire suppression system.

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3)	with an unlabeled fire	suppression system.
Fig	gure 9:	with an unlabeled fire suppression system.
<u>Findin</u>	g 15: ESRB staff observed no	on-operational cooling fan at

#### GO 167-B, Appendix D, MS 9: Conduct of Maintenance states:

"Maintenance is conducted in an effective and efficient manner, so equipment performance and material condition effectively support reliable Plant operation."

During the audit, ESRB staff observed that a cooling fan and the staff observed that a cooling fan and the staff of the staff observed attempts to manually start the fan but were unsuccessful. Additionally, ESRB staff found an inoperable cooling fan

The Plant must fix the inoperable fans. It is

critical that regular equipment inspections are conducted by the Plant personnel to ensure the reliable performance of the Plant equipment.



Figure 10: View of non-operational cooling fan



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#### Finding 16: ESRB staff observed deteriorated and missing signage at the Plant.

#### GO 167-B, Appendix E, OS 1: Safety states in part:

"The protection of life and limb for the work force is paramount. GAOs have a comprehensive safety program in place at each site."

#### GO 167-B, Appendix D, MS 1: Safety states in part:

"The protection of life and limb for the work force is paramount. The company behavior ensures that individuals at all levels of the organization consider safety as the overriding priority."

#### GO 167-B, Appendix D, MS 4: Problem Resolution and Continuing Improvement states:

"The company values and fosters an environment of continuous improvement and timely and effective problem resolution."

#### GO 167-B, Appendix D, MS 11: Plant Status and Configuration states:

"Station activities are effectively managed so plant status and configuration are maintained to support safe, reliable and efficient operation."

While conducting the facility inspection, ESRB staff observed the absence of a high voltage warning sign Additionally, ESRB staff found instances of missing and deteriorating chemical identification signs on certain containers around the Plant. The facility must perform regular inspections to identify any missing or deteriorated signs, and it must promptly replace the following signs that are absent or damaged:



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2) Two filled unlabeled chemical containers were spotted near the

The Plant informed ESRB staff that the chemical inside the containers was

The Plant must add the appropriate chemical identification labels to the containers.



Figure 13: Unlabeled chemical storage containers

3) Three **chemical containers holding** with severely damaged chemical labels. The Plant must replace the damaged labels immediately.

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Figure 14: Chemical containers filled with

with severely damaged labels.

#### Finding 17: Oil leak

#### GO 167-B, Appendix D, MS 9: Conduct of Maintenance states:

"Maintenance is conducted in an effective and efficient manner so equipment performance and materiel condition effectively support reliable plant operation."

ESRB staff observed oil stains on th
denoting an oil leak. oil is critical for effective cooling, and any oil leakage must be promptly addressed to maintain the reliable operation. It is imperative that the facility initiates the necessary repairs to rectify the oil leakage from the during the during the overhaul.
Figure 15:
with oil stains.

#### Finding 18: OMEC did not submit all requested documents for the audit.

#### GO 167-B, 10. Information Requirement, Section 10.1 Provision of Information states in part:

"Upon SED's request, a Generating Asset Owner shall provide information in writing concerning (a) a Generating Asset; (b) the operation or maintenance of the Generating Asset; (c) the, Initial Certification, Recertification, Corrective Plan, or Notice of Material Change pertaining to the Generating Asset; (d) any Maintenance, Operation, or Corrective Plans pertaining to the Generating Asset; (e) the design, performance, or history of a Generating Asset; (f) event or outage data concerning a Generating Asset including, but not limited to, unavailability reports or outage cause reports..."

### GO 167-B, 11.0 Audits, Inspections, and Investigations, Section 11.1 General Requirement states:

"A Generating Asset Owner shall cooperate with SED during any audit, inspection, or investigation (including but not limited to tests, technical evaluations, and physical access to facilities). An audit, inspection, or investigation may extend to any records pertaining to the specifications, warranties, logbooks, operations, or maintenance of the Generating Asset. Generating Asset Owners, as entities subject to ongoing regulation under this General Order, are hereby notified that these audits, inspections, or investigations will occur on a regular, systematic, and recurring basis supplemented as needed by additional audits, inspections, or investigations to ensure compliance with this General Order."

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### GO 167-B, 11.0 Audits, Inspections, and Investigations, Section 11.5 Third-Party Audits, Tests, or Technical Evaluations states in part:

"During an audit, test, or technical evaluation conducted under this section 11.0, a Generating Asset Owner may submit, or authorize access to, audits, tests, inspections, or technical evaluations previously performed by government agencies, insurance companies, or other persons or entities..."

On July 6, 2023, ESRB requested a total of 79 documents and records in the pre-audit data request (DR) to be submitted by October 18, 2023. However, OMEC did not submit 25 of the 79 documents requested in the pre-audit data request to ESRB and offered a review of the unsubmitted documents on-site.

On October 3, 2023, after the audit, ESRB requested six of the documents that were originally not submitted as part of the pre-audit DR response. OMEC provided ESRB with only three of the six documents requested after the audit. Since ESRB field audits are conducted in a limited time frame, it is crucial for a complete audit that a Generating Asset Owner (GAO) provides ESRB with all requested documents and records in a timely manner for ESRB's review before commencing an audit by the requested date.

Furthermore, on-site review is not intended to do a supplemental review of unsubmitted documents. It is rather intended to be a verification process of compliance with GO 167-B requirements for the documents which are not suitable for submission prior to the audit, see items 1, 35, and 39 in II. List of Documents Requested.

In response to our audit report, OMEC needs to submit all requested documents of Requests #10, 11, 14, 40, 41, 42, 66, 72 and 82 given in Table 1 below.

Table 1- List of unsubmitted Data Request (\* Requested twice in pre-audit and post audit process)

Unsubmitted Audit Data Request	Remark
Request 4: Evacuation Drill Report & Critique (last 3 years)	On-site review was completed
Request 6: MSDS for All Hazardous Chemicals	On-site review was completed
Request 10: List of all CPUC Reportable Incidents (last 5 years)	No response was received
Request 11: Root Cause Analyses of all Reportable Incidents (if any) *	No response was received
Request 14: Insurance Report / Loss Prevention / Risk Survey (last 3 years) *	No response was received
Request 18: Plant Physical Security and Cyber Security Records*	Submitted with the 2 <sup>nd</sup> request

Request 27: Daily CEMS Calibration Records	On-site review was completed	
Request 32: Daily Round Sheets / Checklists	On-site review was completed	
Request 33: Feedwater Grab-sample Test Records	On-site review was completed	
Request 35: Logbook (Onsite)	On-site review was completed	
Request 40: All Root Cause Analyses*	No response was received	
Request 41: Borescope Inspection Reports*(last 2 years)	No response was received	
Request 42: Maintenance & Inspection Procedures	No response was received	
Request 47: DC Lube Oil Pump Test Records	On-site review was completed	
Request 49: P&IDs	On-site review was completed	
Request 50: Vendor Manuals	On-site review was completed	
Request 52: Shelf-life Assessment Report	On-site review was completed	
Request 60: FAC Inspection Procedure & Measurements *	Submitted with the 2 <sup>nd</sup> request	
Request 61: Pipe Hangers / Support Calibration Records*	Submitted with the 2 <sup>nd</sup> request	
Request 65: DC Lube Oil Pump Test Records	On-site review was completed	
Request 66: Emergency Stop Valve Test Records on Main Steam Line	No response was received	
Request 72: Polarization Test Records	No response was received	
Request 80: Calibration Procedures and Records	On-site review was completed	
Request 81: Maintenance & Inspection Procedures and Records	On-site review was completed	
Request 82: Internal Audit Procedures and all Records	No response was received	

### II. List of Documents Requested

Category	Reference #	CPUC-Requested Documents
	1	Orientation Program for Visitors and Contractors**
	2	Evacuation Procedure
	3	Evacuation Map and Plant Layout
	4	Evacuation Drill Report & Critique (last 3 years)
	5	Hazmat Handling Procedure
	6	MSDS for All Hazardous Chemicals
	7	Injury & Illness Prevention Plan (IIPP) (last 3 years)
	8	OSHA Form 300 (Injury Log) in last 4 years
Safaty	9	OSHA Form 301 (Incident Report) in last 4 years
Salety	10	List of all CPUC Reportable Incidents (last 5 years)
	11	Root Cause Analysis of all Reportable Incidents
	12	Water Based Fire Protection, Fixed Extinguishers records
	13	Fire Alarm Inspection Record and annual flow test records
	14	Insurance Report / Loss Prevention / Risk Survey (last 3 years)
	15	Lockout / Tagout Procedure (last 3 revisions, if applicable)
	16	Arc flash Analysis
	17	Confined Space Entry Procedure
	18	Plant Physical Security and Cyber Security Procedures and Records
	19	Safety Training Records
Tusining	20	Skill-related Training Records
Iraining	21	Certifications for Welders, Forklift & Crane Operators
	22	Hazmat Training and Record
	23	Latest list of Qualified Contractors
Contractor	24	Contractor Selection / Qualification Procedure
Contractor	25	Contractor Certification Records
	26	Contractor Monitoring Program
	27	Daily CEMS Calibration Records
	28	Air Permit
Regulatory	29	Water Permit
	30	Spill Prevention Control Plan (SPCC)
	31	CalARP Risk Management Plan (RMP)
O&M	32	Daily Round Sheets / Checklists
	33	Feedwater Grab-sample Test Records
	34	Water Chemistry Manual
	35	Logbook**

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	36	List of Open/Backlogged Work Orders	
	37	List of Closed/Retired Work Orders (last 2 years)	
	38	Work Order Management Procedure (last 3 revisions, if applicable)	
	39	Computerized Maintenance Management System**(Demonstration Onsite)	
	40	All Root Cause Analyses (if any)	
	41	Borescope Inspection Reports (last 2 years)	
	42	Maintenance & Inspection Procedures (or Related Documents) (last 3 revisions, if applicable)	
	43	Intercooler Inspection Reports	
Gas Turbine	44	Combustors Inspection (CI) Reports	
	45	Hot Gas Path (HGI) Inspection Reports	
	46	Bearing Lube Oil Analysis Reports	
	47	DC Lube Oil Pump Test Records	
Main Plant Compressor(s)	48	Inspection Procedures and Records	
Document	49	P&IDs	
Document	50	Vendor Manuals	
Spare Parts	51	Spare Parts Inventory List	
Spare I arts	52	Shelf-life Assessment Report	
Management	53	Employee Performance Review Procedures and Verifications	
wianagement	54	Organizational Chart	
	55	Tube Analysis Report	
	56	Chemical Clean Report	
HRSG	57	Safety Valve Test Records	
	58	Hot Spots / IR Inspection Reports	
	59	Structural Integrity Assessment	
НЕР	60	FAC Inspection Procedure & Measurements	
	61	Pipe Hangers / Support Calibration Records	
	62	NDE Reports	
	63	Overspeed Trip Test Records	
	64	Bearing Lube Oil Analysis Reports	
Steam Turbing	65	DC Lube Oil Pump Test Records	
Steam Turome	66	Emergency Stop Valve Test Records on Main Steam Line	
	67	Borescope Inspection Records	
	68	Most recent Class A (major) STG inspection report	
	69	STG inspection reports from January 2020 to March 2023	
Generator	70	Bearing Lube Oil Analysis	
	71	Maintenance & Inspection Procedures (or related documents)	
	72	Polarization Test Records	

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Transformer	73	Hot Spots / IR Inspection Reports
	74	Oil Analysis Reports
Cathodic Protection	75	Procedures and Inspection Records
Air Cooled	76	Cooling Fans & Motors Inspection Records
Condenser System	77	Cooling Tower Structural Integrity Assessment
	78	Circulating Water Pumps Maintenance Records
Instrumentation	79	Instrument Calibration Procedures and Records
Test Equipment	80	Calibration Procedures and Records
Emission Control		
Equipment	81	Maintenance & Inspection Procedures and Records
Internal Audit	82	Internal Audit Procedures and all Records

\*\* These items may be provided on-site by the first day of the audit.

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