# CPUC AUDIT FINDINGS OF GILROY ENERGY CENTER and GILROY COGENERATION JANUARY 8 – JANUARY 11, 2024

# I. Gilroy Energy Center Findings

The following findings are applicable to the facilities and equipment used to operate the Gilroy Energy Center.

# Finding 1: The Plant must address equipment issues.

# General Order (GO) 167-B, Appendix D, Maintenance Standard (MS) 11: Plant Status and Configuration states:

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

#### GO 167-B, Appendix D, MS 13: Equipment Performance and Materiel Condition states:

"Equipment performance and materiel condition support reliable plant operation. This is achieved using a strategy that includes methods to anticipate, prevent, identify, and promptly resolve equipment performance problems and degradation."

Electric Safety and Reliability Branch (ESRB) identified a crack on the **second second second** 



Finding 2: Nuts on the	were not secured and there is an
outstanding work order for the	demand.

### 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, Operation Standard (OS) 11: Operations Facilities, Tools and Equipment states:

*"Facilities and equipment are adequate to effectively support operations activities."* 

ESRB observed nuts on the **Section** expansion joints that appeared to not be securely tightened against the expansion joint flange. During the audit, the Plant retightened the nuts on the lower expansion joint to the engineered torque specification. ESRB notes that corrosion on the bolts was still present during the retorquing. Corrosion and contamination on the nut and bolt threads may provide torque readings that are not indicative of the true preload on the bolt. The Plant must continue to monitor the expansion joints on the **Section** to ensure the assembly is properly torqued such that no fluid leakage occurs.

Additionally, during the audit document review, ESRB staff found an outstanding work order for the **second state** that the **second state** could not keep up with demand. ESRB questioned the Plant staff regarding the outstanding work order and the Plant staff explained that the **second state** would be addressed the next time the **second state**. The Plant must ensure the issue is corrected during the next operation of the **second state**.



Figure 2: Loose expansion joint nuts.

# Finding 3: The Plant has chronic hot spot issues.

# 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 reliable and efficient operation."

**GO 167-B, Appendix D, MS 13: Equipment Performance and Materiel Condition** states: *"Equipment performance and materiel condition support reliable plant operation. This is achieved using a strategy that includes methods to anticipate, prevent, identify, and promptly resolve equipment performance problems and degradation."* 

ESRB observed that the 2023 Gilroy Energy Center units' infrared (IR) inspection reports highlighted elevated temperatures at the subsequently confirmed by the Plant, that was carried out in 2021. However, despite the subsequently continue to exceed the rated temperatures. The Plant must develop a corrective action plan to address the persistent issue of elevated temperatures at the subsequently continue to exceed the rated temperatures. The Plant must develop a corrective action plan to address the persistent issue of elevated temperatures at the subsequently continue to exceed the rated temperatures. The Plant must develop a corrective action plan to address the persistent issue of elevated temperatures at the subsequently continue to exceed the rate of elevated temperatures at the subsequently continue to exceed the rate of elevated temperatures at the subsequently continue to exceed the rate of elevated temperatures at the subsequently continue to exceed the rate of elevated temperatures at the subsequently continue to exceed the rate of elevated temperatures at the subsequently continue to exceed the rate of elevated temperatures at the subsequently continue to exceed the rate of elevated temperatures at the subsequently continue to exceed the rate of elevated temperatures at the subsequently continue to exceed the rate of elevated temperatures at the subsequently continue to exceed the rate of elevated temperatures at the subsequently continue to exceed the rate of elevated temperatures at the subsequently continue to exceed the rate of elevated temperatures at the subsequently continue to exceed the rate of elevated temperatures at the subsequently continue to exceed temperatures at the subsequently continue temperatures at the

. The plan must be implemented in conjunction with the ongoing monitoring efforts.

# II. Gilroy Cogeneration (Cogen) Findings

The following findings are applicable to the facilities and equipment used to operate the Gilroy Cogen facility.

### Finding 4: The Plant must address various equipment issues.

#### 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 D, MS 11: Plant Status and Configuration states:

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

#### GO 167-B, Appendix D, MS 13: Equipment Performance and Materiel Condition states:

"Equipment performance and materiel condition support reliable plant operation. This is achieved using a strategy that includes methods to anticipate, prevent, identify, and promptly resolve equipment performance problems and degradation."

#### 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."

During the tour of the Plant's facilities, ESRB observed conditions that require repairs. These included findings such as broken gauges, leaks, and improper or loose attachments. The Plant must continue to conduct thorough routine inspections to identify abnormal conditions. The following findings must be addressed:

1. Several valves leading to the instruments on the **several valves** were missing handles. This makes it difficult for employees to readily operate the valves by hand in situations where the operation of the valves is required. If the equipment is still in service, the Plant must reinstall the missing valve handles.



Figure 3: Locations of missing valve handles.

2. A makeshift bungie cord was mounted to electrical conduits and a pipe to support electrical wires. The electrical conduit and pipe that the bungie cord was attached to may not be designed to support the wires. A permanent solution to properly route the wires must be identified.



Figure 4: Makeshift set up to hold electrical wires.

3. An electrical conduit that holds the wires for a **second on** top of the is detached. The conduit must be reattached.



Figure 5: Detached electrical conduit.

4. There is excessive water leakage on the **Excession**. Leaking pumps may result in degraded expected performance due to losses in pressure and flow. The Plant must repair the leak when practicable.



5. Three gauges on the **Sector Constitution** are each not in proper operating condition. The gauges are not properly maintained and exhibit damaged/missing protective covers, atmospheric corrosion due to exposure, and opaque covers. Plant staff suggested to ESRB staff that the gauges are not working and are displaying incorrect readings. Properly functioning and legible instruments are important to the reliable operation of the facility.



#### Finding 5: Evidence of oil leaks on 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 materiel condition effectively support reliable plant operation."* 

### 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 reliable and efficient operation."

The shows evidence of oil leaks. There are soiled oil absorbent pads placed in areas with potential oil leakage. Lubrication oil is essential for the safe and reliable operation of the **shows** The Plant must continue to monitor the area for oil leaks and address any active leaks.



Finding 6: Out of service pump.

# 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 reliable and efficient 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 reliable and efficient operation."

One of the **sector** pumps was removed from service and appeared to be decommissioned. Upon reviewing the Piping and Instrumentation Diagram (P&ID) for the **system**, the drawing still showed this equipment as in service. If this equipment is permanently decommissioned, the Plant must properly document and redline the P&ID to depict the current configuration of the **system**.



Figure 9: Decommissioned



# 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. 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 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."

2010 California Fire Code California Code of Regulations (CCR), Title 24, Part 9

"107.1 Maintenance of safeguards. Whenever or wherever any device, equipment, system, condition, arrangement, level of protection, or any other feature is required for compliance with the provisions of this code, or otherwise installed, such device, equipment, system, condition, arrangement, level of protection, or other feature shall thereafter be continuously maintained in accordance with this code and applicable referenced standards."

From the post inspection document request for the inspection report, ESRB staff found evidence of broken and corroded piping for the system. This corresponds to three separate

deficiencies found in the inspection report. The Plant must create a plan to address the deficiencies noted in the inspection reports.



Figure 10: Broken piping on the



# Finding 8: The Plant's Spill Prevention, Control, and Countermeasure (SPCC) Plan requires updates.

# 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 7: Operation Procedures and Documentation** states in part: *"Procedures are current to the actual methods being employed to accomplish the task..."* 

The current SPCC plan for Gilroy Cogen states that the **Sector** is equipped with a **During the audit, ESRB inspected the Sector** with Plant staff and confirmed there was no dedicated **Sector** equipped. The Plant must update its SPCC to accurately reflect the equipment and alarms that are available on the **Sector**. Or if deemed necessary, the Plant may consider installing a

Additionally, the SPCC had a checklist that referenced annual **sectors** for the **sector** for the **sector**. The Plant indicated this checklist item should be "N/A" instead of requiring its inspectors to enter it as a checklist item.

# **III.** General Findings

The following findings are applicable to the common facilities and equipment used to operate both the Gilroy Energy Center and Gilroy Cogen facilities.

# Finding 9: Both facilities require improvements to their corrosion control and mitigation programs.

# **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 reliable and efficient operation."

# **GO 167-B, Appendix D, MS 13: Equipment Performance and Materiel Condition** states: *"Equipment performance and materiel condition support reliable plant operation. This is achieved using a strategy that includes methods to anticipate, prevent, identify, and promptly resolve equipment performance problems and degradation."*

# 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."

ESRB identified widespread corrosion and associated corrosion damage around the plant. As seen in the Figures below, these areas included corroded **pipelines**, valves, equipment enclosures, and electrical conduits. The corrosion on the **pipeline** poses safety concerns because **pipeline**. Monitoring the integrity and thickness of the **pipe** is essential for safety. The Plant must establish a corrosion control and mitigation plan to prevent the further progression of corrosion in both facilities.



Figure 12: Corrosion on the overhead



Figure 13: Corrossion on the valve.







Figure 18: Corrosion on piping next to the



Figure 19: Corrosion on and around electrical conduits.



Figure 20: Corrosion on an electrical junction on top of the

Additionally, on the **EXER** identified significant hotspot damage and associated corrosion. Areas around the **EXERCISE** and **EXERCISE** showed cracks and heavy corrosion. The Plant must create a plan to resolve the root cause of the hotspots and must repair the areas with significant damage (i.e. cracks).





Figure 22: Heavy corrosion and a crack on the



Figure 23:

corrosion seen from both sides.



cabinet.

# Finding 10: The Plant must continue to maintain and replace missing or deteriorated signage.

# 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."

ESRB observed several deteriorating and missing signs and labels, including labels and labels. Some labels were also labeled incorrectly. Safety signage helps inform employees, contractors, and visitors who may be unfamiliar with the equipment of their inherent dangers. The Plant must continue to perform routine inspections to identify damaged, degraded, or missing signs and it must immediately replace the following missing or deteriorated signs:

1. There was a blank information tag on the **Plant**. At another location, there was a blank information tag on the normally closed **Plant**. The writing on both tags had worn off. The Plant corrected these issues at both locations during the audit.



Figure 25: Blank "Notice" tags.

2. The Personal Protection Equipment (PPE) requirement label on a **second second** in the **second** is damaged.



Figure 26: Damaged PPE requirement signage.

3. Corrosive chemicals are stored near the **Second Second** area, but the National Fire Protection Agency (NFPA) diamond does not have the "COR" labeling to indicate there are corrosive chemicals present in the area.



Figure 27: NFPA Hazard Diamond without corrosive identification.

4. The number in the yellow Reactivity Hazard diamond for the **second second** needs to be "1" according to the Safety Data Sheet (SDS).



Tigure 20. Container with

5. The area outside of the area did not have an NFPA label.



6. The manhole to the **space** sign. has a faded confined space sign.



Figure 30: Faded confined space sign on

7. The confined space signs on the **second** are damaged and need to be replaced.



Figure 31: Deteriorated and illegible confined space signage.

8. The pipe labels for the degrade and need to be repaired.

Figure 32: Deteriorating	<b>7</b>	identification.	

9. The label on the

needs to be fixed to read "non-flammable".



10. The container in the search area that holds search has two conflicting labels. One label indicates the container holds search to the plant must remove the incorrect label to avoid possible misidentification or mismanagement of the chemical inside the container.



Figure 34: Conflicting labels on the same container.

11. The evacuation map in is outdated and does not show the current secondary evacuation assembly area.



Figure 35: Outdated evacuation map.

12. The tank is missing a confined space sign.

# Finding 11: The Plant must address general equipment and housekeeping issues.

# 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."

ESRB identified a secondary containment valve that was open. An open valve on secondary containment defeats the purpose of the secondary containment since the accumulated liquids would exit through the open valve. The Plant immediately corrected the issue during the audit. Moving forward, the Plant must keep all secondary containment valves normally closed when not performing any draining operations.



Figure 36: Open secondary containment valve in the

GO 167-B, Appendix E, OS 11: Operations Facilities, Tools and Equipment states: "Facilities and equipment are adequate to effectively support operations activities."

Additionally, ESRB observed a fine that was routed throughout the supports and The end of this fine was wrapped around a chain link fence. The Plant must improve its housekeeping for fine that enter the fine area.



# Finding 12: The Plant must continue to inspect and maintain the equipment.

# 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."

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

"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..."

ESRB observed various defective equipment in the **second second** rooms of the facility.

1. Defective indicator light bulbs on various panels. Functioning indicator lights on the panels are essential to alert Plant staff and contractors about the status of the equipment. The Plant staff must ensure routine inspections are being performed on all panel indicator lights and replace defective bulbs as needed.



2. The breaker handle for the **second second second** 

meant to be in the "ON" position, but the loose handle makes it appear that the **second** is tripped. The Plant must ensure that all breaker handles are tightened.



3. There is an active **Example** in Gilroy Energy Center **Example**. The Plant must regularly check all active alarms and must take corrective action to investigate and address all active alarms.



# Finding 13: The Plant must repair damaged insulation.

#### 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."

#### 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."

ESRB observed various instances of damaged insulation around the facility. Damaged or missing insulation can result in unintentional, accelerated heat gain or loss and can result in energy waste, expose workers to dangerously hot surfaces for Plant staff, and cause corrosion under insulation. The observed locations included, but were not limited to:



Figure 42:

with damaged insulation.



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3. An unnamed pipe on the **Context** of Gilroy Energy Center **Context** with damaged and exposed insulation.



Figure 44: Gilroy Energy Center pipe with damaged insulation.

# Finding 14: The Plant uses flammable materials near equipment.

# 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. 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 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."

# **GO 167-B, Appendix E, OS 4: Problem Resolution and Continuing Improvement** states: *"The GAO values and fosters an environment of continuous improvement and timely and effective problem resolution."*

# 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."

ESRB observed several structures constructed out of wood, a flammable material. The flammable structures were seen in three instances at Gilroy Cogen and Gilroy Energy center. Two of the structures were enclosures that encased instruments near and the flammable. The third instance, at flammable structures, was a wooden walkway near the flammable bottles.

Flammable material in the proximity of operating instruments and energized equipment is a concern affecting the safety of site personnel and the reliable operation of the facility. Additionally, the enclosure is deteriorating and not adequate to protect the instruments from any environmental exposure. The plant must remove the flammable material. If an enclosure or walkway is required by plant staff, implement a non-flammable solution.



Figure 45: Flammable enclosure (



Figure 46: Flammable enclosure (



# Finding 15: Pipe support and hangar issues.

#### 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."

#### 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 13: Routine Inspections states in part:

"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..."

ESRB observed pipe supports and hangars that were either missing labels or traveled beyond their acceptable travel ranges at the following locations:

1. The label on the pipe support for the **must be replaced**. is damaged and must be replaced.



#### Figure 48: Damaged pipe support labels.

2. The pipe hangar is bottomed out beyond the normal Cold position. This condition has been reported in both the position inspection reports and has still not been addressed. The Plant must follow the recommendations in the provide reports to correct the issue.



Figure 49: Pipe hangar exceeds the maximum cold position.

#### Finding 16: Oil seepage on multiple

# 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 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."

# 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."

ESRB obse	rved oil leaking from the	at the	
	oil is essential to maintain safe	temperatures in the	and
provide	for the internal compo	nents. To maintain reliab	le operation,
	oil leaks must be cleaned and addresse	d promptly.	





Figure 51: oil leak.



# Finding 17: The backup batteries in the **maintenance** require improved maintenance.

# 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 4: Problem Resolution and Continuing Improvement states:

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

# 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."

The electrolytic liquid levels for some of the **sector batteries** in the **sector** and the **sector** and the **sector** are low. The fluid meniscus is below the "Low Level" line in some battery cells.

Additionally, the secondary containment under the **batteries** batteries is insufficient. The secondary containment pan is too small, which causes the battery cells to overhang the secondary containment. In the event of a battery leak, the secondary containment may not catch the liquid release if the leak is on the overhanging sections of the batteries.



Figure 53: Low liquid level for the batteries in the



Figure 54: Low liquid level for the batteries in the

.



# Finding 18: Plant personnel are not receiving the required training.

# GO 167-B, Appendix E, OS 6: 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."

# Cal/OSHA Title 8 of CCR, Section 3314 states:

"Cal/OSHA 3314(j): (j) Periodic Inspection. The employer shall conduct a periodic inspection of the energy control procedure(s) at least annually to evaluate their continued effectiveness and determine necessity for updating the written procedure(s)."

### Cal/OSHA Title 8 of CCR, Section 5157 states:

"Annual review required by Cal/OSHA 5157(d)(14): (14) Review the permit space program, using the canceled permits retained under subsection (e)(6) within 1 year after each entry and revise the program as necessary, to ensure that employees participating in entry operations are protected from permit space hazards."

ESRB did not find evidence that the Plant performed the Cal/OSHA required Lock Out Tag Out (LOTO) and Confined Space annual trainings for 2023. The Plant's procedures require refresher training for all staff and refresher refresher

training for LOTO. Confined Space and LOTO training are essential to ensure Plant staff remain educated about these important safety topics.

#### Finding 19: The Plant did not have an anonymous safety suggestion box

#### 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 E, OS 12: Operations Conduct states in part:

"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. Among other things:

*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 observed that the Plant did not have an anonymous safety suggestion box for employee use **ESRB**. The Plant must ensure that the anonymous safety suggestion box is always available for employee use. The Plant corrected this issue during the audit.

# <u>Finding 20: The Plant requires improvements to its work order and testing documentation</u> practices.

**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 4: Problem Resolution and Continuing Improvement** states: *"The GAO values and fosters an environment of continuous improvement and timely and effective problem resolution."*

ESRB reviewed the **Section** inspection done on **Section**, and observed comments about equipment conditions that needed corrective action such as paint chipping on tanks and corrosion at foundation supports. However, there was no associated work order or follow-up documentation to address these findings. Following the audit, the Plant created Work Order to treak and document the work. Moving forward, any inspection findings that require

to track and document the work. Moving forward, any inspection findings that require corrective actions must be documented to ensure the issues are tracked to completion.

Additionally, ESRB reviewed	d the Plant's		for both the
and		tests. For the	
test, there was not a task to re	ecord the	of the pump. For the	
test <b>1</b> , the <b>1</b> noted that the incorrect asset.	ne asset that required th	e test was the	, which is the
ESRB also reviewed	test records for the	un	its. These test records

do not indicate which of the **second** units the test corresponded to. For example, it was not immediately clear if the test record corresponded to **second**. The Plant must ensure its test records are properly labeled to avoid mixing up results between the **second** units.

# IV. List of Documents Reviewed

Category	Reference #	CPUC-Requested Documents
Safety	1	Orientation Program for Visitors and Contractors (Onsite)
	2	Evacuation Procedure
	3	Evacuation Map and Plant Layout
	4	Evacuation Drill Report & Critique (last 3 years)
	5	Hazmat Handling Procedure
	6	SDS for All Hazardous Chemicals
	7	Injury & Illness Prevention Plan (IIPP)
	8	OSHA Form 300 (Injury Log) in last 4 years
	9	OSHA Form 301 (Incident Report) in last 4 years
	10	List of all CPUC Reportable Incidents (last 5 years)
	11	All Root Cause Analyses (last 5 years)
	12	Fire Protection System Test Report and Inspection Record (last 3 years)
	13	Insurance Report / Loss Prevention / Risk Survey (last 3 years)
	14	Lockout / Tagout Procedure
	15	Arc flash Analysis
	16	Confined Space Entry Procedure
	17	Plant Physical Security and Cyber Security Procedures
	18	5-year Water Based Fire Protection System Inspection Record
Training	19	Safety Training Records
	20	Skill-related Training Records
	21	Certifications for Welders, Forklift & Crane Operators
	22	Hazmat Training and Records
Contractor	23	Latest list of Qualified Contractors

Category	Reference #	<b>CPUC-Requested Documents</b>
	24	Contractor Selection / Qualification Procedure
	25	Contractor Certification Records
	26	Contractor Monitoring Program
Regulatory	27	Daily CEMS Calibration Records (Onsite)
	28	Air Permit
	29	Water Permit
	30	Spill Prevention Control Plan (SPCC)
	31	CalARP Risk Management Plan (RMP)
O&M	32	Daily Round Sheets / Checklists (Onsite)
	33	Feedwater Grab-sample Test Records
	34	Water Chemistry Manual
	35	Logbook (Onsite)
	36	List of Open/Backlogged Work Orders
	37	List of Closed/Retired Work Orders
	38	Work Order Management Procedure
	39	Computerized Maintenance Management System (Demonstration Onsite)
Gas Turbine	40	Maintenance & Inspection Procedures (or Related Documents)
	41	Borescope Inspection Reports (last 2 years)
	42	Hot Gas Path Inspection Reports
	43	Combustors Inspection Reports
	44	Intercooler Inspection Reports (if applicable)
	45	Overspeed Trip Test Records
	46	Bearing Lube Oil Analysis Reports
	47	DC Lube Oil Pump Test Records

Category	Reference #	<b>CPUC-Requested Documents</b>
Main Plant Air Compressors	48	Inspection Procedures and Records
Document	49	P&IDs
	50	Vendor Manuals (Onsite)
Spare Parts	51	Spare Parts Inventory List
	52	Shelf-life Assessment Procedures and Reports
Management	53	Employee Performance Review Procedures and Verifications
	54	Organizational Chart
HRSG	55	Tube Analysis Report
	56	Tube Clean Records (Internal and/or external)
	57	Safety Valve Test Records
	58	Hot Spots / IR Inspection Reports
	59	Structural Integrity Assessment
HEP	60	FAC Inspection Procedure & Measurements
	61	Pipe Hangers / Support Calibration Records
Steam Turbine	62	NDE Reports
	63	Borescope Inspection Records
	64	Most recent major STG inspection report
	65	STG inspection reports
	66	Overspeed Trip Test Records
	67	Bearing Lube Oil Analysis Reports
	68	DC Lube Oil Pump Test Records
	69	Emergency Stop Valve Test Records on Main Steam Line
	70	Steam Turbine Water Induction Prevention Procedures
Generator	71	Bearing Lube Oil Analysis
(Combustion and	72	Maintenance & Inspection Procedures (or related documents)

Category	Reference #	<b>CPUC-Requested Documents</b>
Steam Turbine		Electrical Test Records (Reactive power verification, excitation
Generators)	73	control modeling, polarization, etc.)
Transformers (All)	74	Hot Spots / IR Inspection Reports
	75	Oil Analysis Reports
Cathodic Protection	76	Procedures and Inspection Records
Air Cooled Condenser System	77	Cooling Fans & Motors Inspection Records
	78	Cooling Tower Structural Integrity Assessment
	79	Circulating Water Pumps Maintenance Records
Instrumentation	80	Instrument Calibration Procedures and Records
Test Equipment	81	Calibration Procedures and Records
Emission Control		
Equipment (SCR,		
Ammonia, NOx,		
CO)	82	Maintenance & Inspection Procedures and Records
Internal Audit	83	Internal Audit Procedures and all Records