

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 22, 2014

Redacted

Re: Spaulding Corrective Action Plan

Dear Mr. Redact

Thank you for your team's timely response to our request for a Corrective Action Plan (CAP) for violations cited as a result of the February 4, 2013 Spaulding Tramway Site inspection. This inspection was in response to the November 15, 2013 Spaulding Tramway Injury Accident.

To reiterate the CPUC's position; the CPUC applauds and accepts PG&E'S efforts on those corrective actions taken on violations 1, 2, 3, 4, 6, 9, 10, 11 and 12. Furthermore, the CPUC withdrew its finding number 5 after further review of photographic evidence. Finally, the CPUC is encouraged by the suspension of tram operations for transporting people until the remaining violations are corrected.

In correcting any violations, PG&E is to devise a plan or course of action and make repairs as appropriate to ensure the safety of all personnel. The methodology of that correction shall not be challenged as long as the goal of safety and correction of the violation is achieved.

As agreed, PG&E will correct all the remaining violations. PG&E will provide Proof of Completion (POC) as the violations are corrected no later than the dates specified in the CAP response letter of July 31, 2014.

The following violations and POC are to be addressed:

Violation #7: CAP Goal, provide a means to assist the operator to efficiently follow, check and record the required twenty step daily tramway equipment inspection and documenting procedure.

To confirm correction, the CPUC Inspector will need to:

- 1) Review a written copy of Spaulding Tram Operating Procedure PG-3514P-01 showing the requirement for the Operator to document their daily equipment inspection on the tailboard form.
- 2) Review any additional documentation and the equipment checklist.

Violation #8: CAP Goal, provide a means to raise the awareness of Management to the verbal and non-verbal concerns of personnel.

To confirm correction, the CPUC Inspector will need to:

- 1) Review a copy of the newly written Comprehensive Communications Package.

Violation #13: CAP Goal, provide an equivalent to an annual fire drill as required by NFPA 101.a

To confirm correction, the CPUC Inspector will need to:

- 1) Review the Outage Planning Process showing the requirement for all personnel to review and walkthrough the emergency response plan. Specifically the section(s) that pertain to fire and fire related emergencies.

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Violation #14: CAP Goal, Establish a Tram Safety Rescue Plan that provides for emergency egress, self extrication and emergency rescue of personnel from the tram. The Plan must emphasize self-reliance (i.e. using plant staff) to ensure a rapid response by reducing the dependence on outside agencies for equipment or services where appropriate.

To confirm correction, the CPUC Inspector will need to:

- 1) Review the Proposed Evacuation Plan 1, with an emphasis on "self-rescue" and
- 2) Review the Proposed Rescue Plan 2, with the emphasis on rescuing non-ambulatory personnel.

Violation #15: CAP Goal, provide contingencies for natural disasters.

To confirm correction, the CPUC Inspector will need to:

- 1) Review the proposed updated and revised Emergency Response Plan (ESP).
- 2) Ensure this new ESP provides processes or procedures that take into account those emergencies that may compromise the normal egress paths and provide essential items for plant staff to "shelter in place".

Violation #16: CAP Goal, comply with or demonstrate compliance with industry standards for a mechanically safe tramway.

To confirm correction, the CPUC Inspector will need to:

- 1) Review the Wire Rope Analysis; MRT from 07/16/14.
- 2) Review all written reports, assessments and analyses that establishes the values given for Motor Torque, Worm Gear and Output Shaft Brake strength and braking power.
- 3) Review newly written procedures showing the frequency and type of inspections to be performed.
- 4) Review evidence of the installation of a Temporary Auxiliary Power Unit (and permanent APU: 2015).
- 5) Review evidence of Secondary Haul Cable (Safety) Attachment.
- 6) Review evidence of the Loading Area Cable Guard installation.
- 7) Review evidence of the 8 inch sheave replacement.
- 8) Review the feasibility study for an additional device to act as a parking brake for the tram car. Proof must be provided that appropriate safe guards were considered and are in place. For example, as prescribed in PG&E LOTO Procedures PG-S403 and more specifically Sections 5 and 8 (as appropriate), tags and switches will be used and positioned correctly. Additionally, when "Tagged Out", the "Lock Out" procedure will minimize tram "Car" movement independent of the motor or cable (in case they become compromised) to protect employees and rescuers from injury due to such movement.

The majority of the above violations are expected to be corrected by December 31, 2014 with the exception of the Cable MRT (07/16/14) and installation of a permanent APU (sometime in 2015). Please send any POC Documentation to me prior to this date if it becomes available. If you have any questions or need any assistance, please contact me by email or at 916-835-7448.

Sincerely,

A handwritten signature in black ink, appearing to read "James T. Cheng", written over a horizontal line.

James T. Cheng, Utilities Engineer
Safety and Enforcement Division

CC: Redacted Debbie Powell, Eric Jacobson