

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



August 19, 2022

Michael Le  
Plant Superintendent  
Oakland Power Company, LLC  
6555 Sierra Drive  
Irving, TX 75039

**SUBJECT: General Order (G.O.) 167-B Audit of Oakland Power Plant  
Audit Number GA2022-10OAK**

Dear Mr. Le:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Chris Lee and Emiliano Solorio of ESRB staff conducted a generation audit of Oakland Power Plant from July 18 through July 22, 2022.

During the audit, ESRB observed plant operations, inspected equipment, reviewed data, interviewed plant staff, and identified potential violations of General Order (GO) 167-B. A copy of the audit findings itemizing the violations is attached. Please advise me by email no later than September 16, 2022, by providing electronic copy of all corrective actions and preventive measures taken and/or planned to be taken to resolve the violations. Your response should include a Corrective Action Plan with a description and completion date of each action and measure completed. For any violations not corrected, please provide the projected completion dates to correct the violations and to achieve full compliance with GO 167-B.

Please submit your response to Chris Lee at [chris.lee@cpuc.ca.gov](mailto:chris.lee@cpuc.ca.gov). Please note that although Oakland Power Plant has been given 30 days to respond, it has a continuing obligation to comply with all applicable GO 167-B requirements; therefore, the response period does not alter this continuing duty.

If you wish to make a claim of confidentiality covering any of the information in the report, you may submit a confidentiality request pursuant to Section 15.4 of GO 167-B, using the heading "General Order 167-B Confidentiality Claim". The request should be sent to Chris Lee with a copy to me and the GO 167 inbox [GO167@cpuc.ca.gov](mailto:GO167@cpuc.ca.gov) by September 16, 2022.

Thank you for your courtesy and cooperation throughout the audit process. If you have any questions concerning this audit, please contact Chris Lee at [chris.lee@cpuc.ca.gov](mailto:chris.lee@cpuc.ca.gov) or (415) 703-1323.

Sincerely,

A handwritten signature in blue ink that reads "Banu Acimis".

Banu Acimis, P.E.  
Program and Project Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission

Attachment: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC  
Nika Kjensli, Program Manager, ESRB, SED, CPUC  
Rickey Tse, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC  
Nathan Sarina, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC  
Chris Lee, Utilities Engineer, ESRB, SED, CPUC  
Emiliano Solorio, Utilities Engineer, ESRB, SED, CPUC

# CPUC AUDIT FINDINGS OF OAKLAND POWER PLANT July 18 – 22, 2022

## I. Findings Requiring Corrective Action

### Finding 1: The Plant is not properly completing forms.

General Order (GO) 167-B, Appendix E, Operation Standard (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 4: Problem Resolution and Continuing Improvement states:

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

ESRB observed that completed Pre-Job Brief forms with the work order number and the supervisor review were missing. The proper completion of the Pre-Job Brief and the supervisor review are critical for ensuring that the Plant personnel consider hazards associated with each job before starting the work.

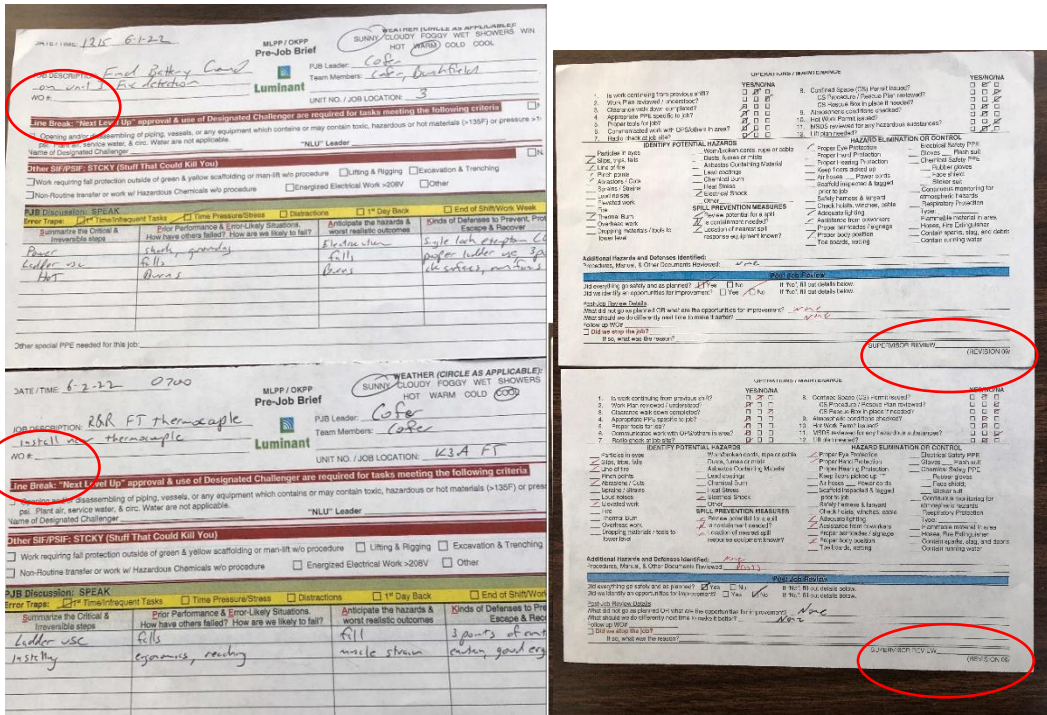


Figure 1. Pre-Job Brief forms with work order number and supervisor review missing.

In addition, ESRB observed that the revised Monthly Spill Prevention Control and Countermeasure (SPCC) inspection form was being filled out incorrectly. Sometime between February 2022 and May 2022, one of the questions on the inspection form was changed from “Are Containers within designated storage areas?” to “Are Containers not within designated storage areas?” requiring a different response if the situation has not changed. However, the response was the same.

Oakland Power Plant Facility Monthly SPCC Inspection Checklist						
Date of Inspection: 2/28/22		Inspector (signature) [Signature]				
Date of Review		Supervisor (signature)				
Bulk Storage Tanks Inspection Item (storage amount)	Is there Evidence of Active Leaks/Spills from the tank?	Is there water, debris, cracks, or fire hazards in external secondary containment?	Is there evidence of leaks, corrosion or damage to piping, including gaskets and valves?	Gauge the tank and Record the result on the form. Are results normal?	Are there liquids in the secondary containment steel shell of the tank?	Check for continuity and operation of level alarms. Are results abnormal?
Diesel Dump Tank #1 (120 gal)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/> Level 2.1 gal	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>
Diesel Dump Tank #2 (120 gal)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/> Level	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>
Diesel Dump Tank #3 (120 gal)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/> Level 0.1	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>
Bulk Storage Tanks Inspection Item (storage amount)	Is there Evidence of Active Leaks/Spills from the tank?	Is there debris, cracks, or fire hazards in external secondary containment?	Is there evidence of leaks, corrosion or damage to piping, including gaskets and valves?	Is the level gauge operable and readable? Record the result on the form.	Are there liquids in the secondary containment?	Is the containment drain valve operable and in a closed position?
Oily Water Storage Tank (#224 gal)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/> Level 2.975 gal	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>
Comments/Notes						
Portable Containers Inspection Item (storage amount)	Evidence of Leaks/Spills from container?	Any containers distorted, buckling, denting or bulging?	Are Containers within designated storage areas?	Any debris, spills or fire hazards in containment or storage area?	Any pathways blocked?	Any water in any outdoor secondary containment?
Drum Storage-Unit 1 (amount varies)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/> NA
Drum Storage-Fuel Pump Room (amount varies)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/> NA
Drum Storage-HW Accumulation (1 drum-55 gal)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/> NA
Hazardous Waste Storage Building (amount varies)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/> NA
Comments/Notes						
Monthly Inspection Checklist Page 1 of 2				Retain for Minimum 36 months		

Figure 2. Monthly SPCC Inspection for February 2022.

Oakland Power Plant Facility Monthly SPCC Inspection Checklist						
Date of Inspection: 5/29/22		Inspector (signature) [Signature]				
Date of Review		Supervisor (signature)				
Bulk Storage Tanks Inspection Item (storage amount)	Is there Evidence of Active Leaks/Spills from the tank?	Is there water, debris, cracks, or fire hazards in external secondary containment?	Is there evidence of leaks, corrosion or damage to piping, including gaskets and valves?	Gauge the tank and Record the result on the form. Are results normal?	Are there liquids in the secondary containment steel shell of the tank?	Check for continuity and operation of level alarms. Are results abnormal?
Diesel Dump Tank #1 (120 gal)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/> Level 2.1 gal	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>
Diesel Dump Tank #3 (120 gal)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/> Level 2.1 gal	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>
Bulk Storage Tanks Inspection Item (storage amount)	Is there Evidence of Active Leaks/Spills from the tank?	Is there debris, cracks, or fire hazards in external secondary containment?	Is there evidence of leaks, corrosion or damage to piping, including gaskets and valves?	Is the level gauge operable and readable? Record the result on the form.	Are there liquids in the secondary containment?	Is the containment drain valve operable and in a closed position?
Oily Water Storage Tank (9734 gal)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/> Level 1100	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>
Comments/Notes						
Portable Containers Inspection Item (storage amount)	Evidence of Leaks/Spills from container?	Any containers distorted, buckling, denting or bulging?	Are Containers not within designated storage areas?	Any debris, spills or fire hazards in containment or storage area?	Any pathways blocked?	Any water in any outdoor secondary containment?
Drum Storage-Unit 1 (amount varies)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/> NA
Drum Storage-Fuel Pump Room (amount varies)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/> NA
Drum Storage-HW Accumulation (1 drum-55 gal)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/> NA
Hazardous Waste Storage Building (amount varies)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input checked="" type="radio"/> No <input type="radio"/> NA
Comments/Notes						

Figure 3. Monthly SPCC Inspection for May 2022 When forms are revised, the revision version and/or date should be noted on the forms, and the Plant staff should be notified of the changes, and trained, if necessary, to properly fill out the forms.

The supervisor signature was also missing from the Monthly SPCC Inspection forms.

**Finding 2: A current Lock-Out-Tag-Out (LOTO) was missing tags.**

**GO 167-B, Appendix E, OS 14: Clearances** states in part:

*“Work is performed on equipment only when safe. When necessary, equipment is taken out of service, de-energized, controlled, and tagged in accordance with a clearance procedure.”*

ESRB walked down LOTO #21003 for review and observed that several LOTO tags were missing. Tag numbers 30, 31, 32, 34, 36 and 40 were missing from a circuit breaker box. The photo below shows three of the red lockout devices are missing tags. At least one LOTO was missing the red lockout device itself.



Figure 4. LOTO #21003 Tag #1 at the lock box (Left photo). The circuit breaker box that is missing LOTO tags (Right photo).

**Finding 3: The fuel supply pipes are not properly supported.**

**GO 167-B, Appendix E, Maintenance Standard (MS) 17: Equipment History** states:

*“Maintenance standards or procedures clearly define requirements for equipment history for the systems and equipment, including, what information or data to collect, how to record data, and how the data is to be used.”*

At the fuel tank, ESRB observed two locations where an outgoing pipe is supported by stacks of wood rather than spring-loaded pipe supports as it was originally designed. In addition, ESRB observed fully compressed supports, an indication that they may no longer be providing adequate support. The Plant must have the fuel pipe supports inspected by an expert to assess their condition.



Figure 5. Two locations where the spring-loaded pipe supports have been replaced with stacks of wood.



Figure 6. A fully compressed spring-loaded pipe support.

**Finding 4: The air switch at Transformer #9 is lacking a clear deterrence against unauthorized operation.**

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.”*

The manually operated air switch at Transformer #9 lacks clear deterrence against unauthorized operation of the air switch. Transformer #9 is the step-up transformer for Unit K3. The air switch is located upstream of the transformer and is used to connect Unit K3 to the grid each time it starts up. The air switch handle is designed with a lockable mechanism, but the Plant does not utilize it. The Plant must put up a clear warning sign or make use of the locking mechanism.



Figure 7. Transformer #9 for Unit K3, with the arrow pointing to the air switch handle.



Figure 8. The air switch handle.

**Finding 5: Barbed wires are broken in one section of the Plant perimeter.**

**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.”*

In one section along the western perimeter of the fuel storage area, ESRB observed broken barbed wires. Although intrusion through this area may still be challenging due to the razor wire that loops around the barbed wires, the Plant must repair the broken wires to present strong deterrence against potential intruders.





Figure 9. Broken barb wire along the western perimeter wall.

**Finding 6: The Plant did not properly store equipment.**

**GO 167-B, Appendix E, OS 3: Operations Management and Leadership** states:

*“Operations management establishes high standards of performance and aligns the operations organization to effectively implement and control operations activities.”*

**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 comprehensivesafety program in place at each site.”*

ESRB observed equipment that were not stored in their proper places. The flame resistant (FR) suit used for air switch operation at Transformer #9 was stored on a chair under a stairway. A hand crank was seen on the pedestal at Transformer #7. It appears the hand crank is for the transformer tap changer, which the Plant does not adjust. ESRB also observed trip hazards created by improper placement of items.



Figure 10. The FR suit for air switch operation.



Figure 11. A hand crank on the concrete pedestal at Transformer #7.



Figure 12. A water hose and a cord on top of a confined space entrance.

**Finding 7: The Plant does not keep records in a consistent and reliable manner.**

**GO 167-B, OS 17: Records of Operation** states:

*“The GAO assures that data, reports and other records reasonably necessary for ensuring proper operation and monitoring of the generating asset are collected by trained personnel and retained for at least five years, and longer if appropriate.”*

The Plant was unable to find 2021 overspeed test documents. This test is conducted annually. In addition, for the 2018 – 2022 calibration records that ESRB requested prior to the audit, the Plant kept 2018 – 2021 records in Maximo, the computerized maintenance management system, but kept only hand-written records for 2022. To effectively retain records, the Plant must consistently use a secure and reliable method.

STAPLES

**CALIBRATION RECORD**  
OAKLAND POWER PLANT - 2022

NAME	DATE	PASS	FAIL	COMMENTS
Burchfield	1-24-22	✓		Cal for Jan 2022
Cofar	1-25-22	✓		cal for Feb 2022
Burchfield/Leontis	2-25-22	✓		Cal for K1 work
Burchfield	7/23/22	✓		K3 stack work
Burchfield	3/24/22	✓		K2 stack work
Cofar	3-25-22	✓		Sump 3
Burchfield	3/24/22	✓		K3B Filter house
Cofar	3/24/22	✓		Cal for Apr. 1 2022
Sabu Santillana	3/24/22	✓		K3B Rect reports
Cofar	3-25-22	✓		Bump for Sump 3
Burchfield	3-30-22	✓		Bump for Sump 3 POTS
Burchfield	3/31/22	✓		Bump for Sump #2 & 3 work POTS
MAYN	4/14/22	✓		BUMP FOR SUMP #2
Burchfield	4/15/22	✓		Bump Test for K3B
Cofar	5-17-22	✓		Bump test for K3B
Burchfield	5/26/22	✓		June 2022 test
Cofar	7/13/22	✓		Bump for HW and CS
Cofar	7/15/22	✓		Calibration for entry NB Exhaust Collector
Cofar	7-20-22	✓		Bump for PVC <sup>on order</sup> <sub>disturb-on order</sub>

Figure 13. Handwritten 2022 calibration records.

**Finding 8: Some documents need to be updated or revised.**

**GO 167-B, OS 7: Operation Procedures and Documentation** states in part:

*“Operation procedures and documents are clear and technically accurate, provide appropriate direction, and are used to support safe and reliable plant operation. Procedures are current to the actual methods being employed ...”*

ESRB found the following documents in need of updating:

- Oakland SPCC Plan, June 2021: The map on page 49 of 488 does not show the spill kit drums at the northeast rollup area and at Unit K3B.
- Work Management System Procedure No. OMP 11-01 (Revision 3): On page 2-8, the header reads, Revision #2.
- SAF-ADM-PG0001 Contractor Safety Program: The word “Constructor” needs to be added to the definitions.

Documents must be updated and reviewed periodically to check for accuracy.

## II. Observations and Recommendations

### **Observation 1: A hot stick was missing the inspection sticker.**

**GO 167-B, OS 1: Safety** states in part:

*“The protection of life and limb for the work force is paramount. ... 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.”*

The one hot stick at the Plant did not have an inspection sticker. The Plant only provided an invoice for a hot stick retest that was conducted by Burlington Safety Laboratory, dated 4/5/2022.