

DOCKETED

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Project Title:	Compliance - Application for Certification of PG&E Geysers Unit 18
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Memorandum

To: Commission Docket

Date October 15, 2018

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From : **California Energy Commission**
1616 Ninth Street
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Subject: GPC Quicksilver Unit 16 (79-AFC-05C), GPC Socrates Power Plant Geysers Unit 18 (79-AFC-03C), GPC Grant Power Plant Geysers Unit 20 (82-AFC-01)
Revised Worker Safety-1 Condition of Certification

On August 23, 2018, staff filed its Staff Assessment of the Geysers Power Company, LLC's (Applicant) Petition to Amend requesting identical modifications at each of the facilities to replace temporary portable emergency diesel engines with stationary permanent emergency diesel engines for the cooling tower wet down systems to aid in fire prevention at the Quicksilver, Socrates, and Grant geothermal power plants.

On September 17, 2018 the project owner filed comments on the Staff Assessment including comments and suggested edits to **Worker Safety-1**. After considering those comments, staff proposes the attached revised **Worker Safety-1**, which will replace the version contained in the Staff Assessment filed on August 23, 2018. Staff's proposed edits to the condition do not change any of the analysis found in the Staff Assessment.

Thank you,



Eric W. Veerkamp
Compliance Project Manager

Changes below from the August 23, 2018 Staff Assessment are shown below. (Note: Deleted text is in ~~strikethrough~~, new text is **bold and underlined**.)

WORKER SAFETY-1 The project owner shall physically disconnect the piping connection between the cooling tower wet-down system and the plant's fire protection system ~~unless the project owner installs a code compliant integrated wet down/fire protection system after obtaining the approval of the CPM. The installation of an approved integrated system terminates the requirement to disconnect the system.~~ **unless the project owner installs a code compliant integrated wet down/fire protection system after obtaining the approval of the CPM. The installation of an approved integrated system terminates the requirement to disconnect the system.**

Verification: The project owner shall complete the physical disconnection of the cooling tower wet-down system from the plant's fire protection system no later than ~~January 1, 2019 or a later date if agreed upon by the CPM.~~ **June 1, 2019. Within 10 days after the disconnection the project owner shall submit a letter stating that the physical disconnection has occurred and provide a photograph showing the disconnection. The CPM may approve a later date for disconnection if the project owner has submitted a request for alternate means of protection pursuant to Title 24 California Fire Code section 1.11.2.4 to the CPM for review and approval.** The CPM shall be notified at least 30 days prior to the current disconnection date, if the project owner wishes to seek an extension to the current disconnection date. ~~The project owner shall submit a letter stating that the physical disconnection has occurred and provide the final DCBO approved design drawings along with photographs showing the implementation no later than 30 days after the disconnection~~