

DOCKETED

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RUSSELL CITY ENERGY COMPANY, LLC

717 Texas Avenue
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May 6, 2022

Drew Bohan
Executive Director
California Energy Commission
715 P Street
Sacramento, CA 95814

RE: Russell City Energy Center (01-AFC-07C): Bi-Weekly Compliance Report

Mr. Bohan:

Pursuant to California Energy Commission (“CEC”) Order No. 22-0426-3¹, the Russell City Energy Company, LLC (“Project Owner”) hereby submits this compliance report outlining the progress made towards completion of the nine corrective actions identified in Chapter 4 of CEC Staff’s Root Cause Gap Analysis Report² for the Russell City Energy Center (“RCEC”).

CEC Staff Report RCEC May 2021 Incident Root Cause Gap Analysis	Status
<i>Corrective Actions for equipment maintenance and monitoring program at RCEC (p. 24, 1 of 3)</i> For each HRSG, implement a preventative maintenance and monitoring program for the cold reheat (CRH-1) valve, gearbox and actuator assemblies that includes frequency of inspections, services, and lubrication for review and approval.	Completed and pending review by CEC Staff.
<i>Corrective Actions for equipment maintenance and monitoring program at RCEC (p. 24, 2 of 3)</i> For each HRSG, implement an annual preventative maintenance program for the steam attemperators and mixers for review and approval.	Completed and pending review by CEC Staff.

¹ TN# 242924.

² TN#: 242769.

<p align="center">CEC Staff Report RCEC May 2021 Incident Root Cause Gap Analysis</p>	<p align="center">Status</p>
<p><i>Corrective Actions for equipment maintenance and monitoring program at RCEC (p. 24, 3 of 3)</i></p> <p>Revise operations procedures needed to accommodate implementation of SIA’s restoration recommendations for review and approval.</p>	<p>Completed and pending review by CEC Staff.</p>
<p><i>Corrective Action for control room operator interface and training (p. 24, 1 of 3)</i></p> <p>Synchronize the internal clocks that generate the time and date stamps for alerts and alarms for both the Mark VI and the distributed control system. Review and evaluate the alarm and trip points of RCEC’s programmable logic controllers making them more sensitive to alarm settings, where appropriate.</p>	<p>In process.</p>
<p><i>Corrective Action for control room operator interface and training (p. 24, 2 of 3)</i></p> <p>Consolidate the alarms generated by the DCS and Mark VI control systems into a single control system to reduce the need for operations staff to monitor multiple systems simultaneously.</p>	<p>In process.</p>
<p><i>Corrective Action for control room operator interface and training (p. 24, 3 of 3)</i></p> <p>Reduce the occurrence of nuisance/ false alarms by providing “smart alarm” logic in the consolidated DCS and Mark VI control systems and provide an updated operator training that includes water induction events along with evidence of its completion</p>	<p>The Operator Normal Operating Procedure (ONOP) and operator training are in process.</p>
<p><i>Corrective Action for Inadequate water induction protection (p. 25, 1 of 3)</i></p> <p>Provide an ASME TDP-1-2013 conformance analysis for the RCEC.</p>	<p>Completed and pending review by CEC Staff.</p>

CEC Staff Report RCEC May 2021 Incident Root Cause Gap Analysis	Status
<p><i>Corrective Action for inadequate water induction protection (p. 25, 2 of 3)</i></p> <p>Provide the list of design modifications that are being implemented at RCEC based on the ASME TDP-1-2013 conformance analysis along with evidence of their completion.</p>	<p>Completed list is pending review by CEC Staff. The physical changes are in process.</p>
<p><i>Corrective Action for inadequate water induction protection (p. 25, 3 of 3)</i></p> <p>Implement the SIA restoration recommendations along with evidence of their completion.</p>	<p>Completed documentation is pending review by CEC Staff. Photographs and logic design are in process.</p>

The Project Owner continues to work closely and collaboratively with the CEC and California Public Utilities Commission (“CPUC”) inspection units (collectively, the Joint State Agency Investigation Team or “JAIT”) to ensure that the RCEC is brought back to combined cycle operations in a safe and reliable manner for this summer.

Sincerely,

/s/ Barbara McBride

Barbara McBride
Director of Strategic Origination and Development