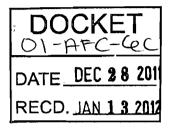


Burbank, California December 28, 2011



California Energy Commission 1516 Ninth Street, MS-2000 Sacramento, CA 95814 Attn: Joseph Douglas, Compliance Project Manager

Subject: Transmittal of Petition for Insignificant Project Change for Adding an Industrial Elevator on the Heat Recovery Steam Generator at Magnolia Power Project

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Attached please find our Petition for Insignificant Project Change for Adding an Industrial Elevator on the Heat Recovery Steam Generator (HRSG) at Magnolia Power Project (MPP). Included with this Transmittal Letter are the following documents, for your consideration:

- Petition for Insignificant Project Change for Adding an Industrial Elevator on the HRSG at MPP.
- Color pictures illustrating the view of the HRSG from a nearby public vantage point (on the I-5 overpass on Magnolia Blvd). The color pictures illustrate a typical public view before and after the addition of the Industrial Elevator.
- Architectural and structural drawing package for the Elevator Addition Project. The drawing package includes the following drawings:
 - o T-1 Title Sheet
 - o S-1&2 General Notes
 - o S-3 Typical Details
 - o S-4 Typical Grating/Guardrail Details
 - o S-5 Foundation Plan and Details
 - o S-6 Framing Plans
 - o S-7 Elevations
 - o S-8 Details
 - o S-9 Mesh Guard Details
- HRSG Elevator Specification Rack and Pinion Passenger/Service Elevator

If additional information or clarification is needed, please contact me at (818) 238-3631.

Sincerely yours,

Ron S. Maxwell, P.E. Power Production Engineer

PETITION FOR INSIGNIFICANT PROJECT CHANGE FOR ADDING AN INDUSTRIAL ELEVATOR ON THE HRSG AT MAGNOLIA POWER PROJECT

At Magnolia Power Project there is a need to add a personnel transport elevator. The primary purpose of the elevator is to address personnel safety concerns, but it also will improve access the equipment platform atop the Heat Recovery Steam Generator (HRSG) for equipment inspections, maintenance, etc. The elevator will effectively reduce the risk of falls from height, eliminate exertion from climbing, and provide the ability to quickly transport injured personnel from height, if needed. This petition for an insignificant project change is to allow the elevator to be added next to the existing (twelve flight) HRSG stair tower.

We also request the California Energy Commission (CEC) approval for the City Building Inspector to act as Chief Building Official (CBO), as authorized in the past.

(A) Description of the proposed modifications:

- General The proposed installation is a rack & pinion elevator of 2760 lb capacity to provide vertical transport service from a base landing to a top landing on the platform that is 87 feet above the base landing. The installation will include a car with elevator controls, a mast, a foundation, and a landing enclosure at the base.
- The passenger car will be constructed of galvanized steel with wall panels of anodized, extruded aluminum. The elevator entry and exit doors will be positioned on two sides of the car. The approximate dimensions of the passenger car will be 4 ft x 7 ft x 7 ft.
- The elevator will be equipped with single automatic controls having buttons in the car and call buttons at both landings. A programmable logic control will handle the control logic and a variable frequency drive.
- A landing enclosure constructed of galvanized plate with a double sliding door shall be included at the elevator base.
- The vertical mast will be fabricated of structural steel that will be hot-dip galvanized and rigidly attached directly to the HRSG structural frame adjacent to an existing stair tower.
- The drive unit will be mounted on top of the car; it will consist of a gear box with drive pinion, electric motor, and electromechanical brake. The drive unit shall be equipped with a variable frequency control for smooth starting/stopping and will have a traveling speed of about 2 feet per second.

- The power supply will be 480V, 3 Phase, 60 Hz and there will be 120V auxiliary power for lighting.
- Safety features will be incorporated with the elevator that will include: a car speed limiting device, top and bottom limit switches, a phase failure relay, safety hooks on the machinery plate, buffer springs below the bottom landing, electrically and mechanically locked doors.

A discussion of the necessity for the proposed modifications

The proposed elevator will provide an alternate means of egress, other than the twelve flight stair tower. The elevator is needed to improve worker safety, facilitate maintenance, and enhance worker productivity. The elevator car will be sized to allow an injured worker to be transported safety, if need be, on a gurney. During plant outages, the elevator will be used to transport tools and parts, as needed for maintenance, to and from the top of the HRSG; this will eliminate the hazards associated with employees carrying tools and parts up and down the twelve flight stair case. The difficulty, exertion, and potential dangers associated with climbing up and down the outdoor stair case will be mitigated.

(B) If the modification is based on information that was known by the petitioner during the certification proceeding, an explanation why the issue was not raised at that time

It wasn't realized at the time of the original certification proceeding, that the amount of maintenance to the equipment on of the HRSG would be so great.

(C) If the modification is based on new information that changes or undermines the assumptions, rationale, findings, or other bases of the final decision, an explanation of why the change should be permitted

The proposed modification – addition of an elevator on the HRSG - does not change or undermine in any way the assumptions, rationale, findings, or other basis of the CEC Final Decision (01-AFC-6).

(D) An analysis of the impacts the modification may have on the environment and proposed measures to mitigate any significant adverse impacts.

Addition of an elevator on the HRSG will have no significant adverse impact on the environment. The only environmental impact identified is the visual impact of the proposed elevator. However, the elevator will be normally be parked at the base level, so only the mast will be visible from outside of the plant. To mitigate any significant adverse visual impact, the mast and elevator components will be galvanized to blend-in and match the adjacent stair tower and platforms on the HRSG.

Perspective views of the HRSG with the elevator addition (before and after) are modeled in the attached photographs, one of which includes a rendering to illustrate the appearance of the elevator from the street adjacent to the Plant.

(E) A discussion of the impact of the modification on the facility's ability to comply with applicable laws, ordinances, regulations, and standards

The proposed modification does not impact the facilities ability to comply with all applicable laws, ordinances, regulations, and standards. The elevator equipment and installation will be in complete compliance with California State laws, and it will require an annual or biannual operation permit from CALOSHA's Elevator Division.

(F) A discussion of how the modification affects the public

The public will be able to see the elevator when looking closely at the HRSG structure from outside the plant site (from the north side). However, due to the insignificance of the visual impact, the modification would most likely not be noticed by the public.

(G) A list of property owners potentially affected by the modification

It is anticipated that no property owners will be affected by the proposed modifications.

(H) A discussion of the potential effect on nearby property owners, the public and the parties in the application proceedings.

It is anticipated that no property owners will be affected by the addition of the elevator, and the public will most likely not notice the modification.