

FEDERAL ENERGY REGULATORY COMMISSION
Office of Energy Projects
Division of Dam Safety and Inspections - Atlanta Regional Office
Gwinnett Commerce Center
3700 Crestwood Parkway, Suite 950
Duluth, Georgia 30096

November 7, 2024

In reply refer to:
P-516 Saluda
P-1894-01 Parr Shoals
P-1894-02 Fairfield
P-2009-01 Roanoke Rapids
P-2009-02 Gaston
P-2315 Neal Shoals
P-2535 Stevens Creek
P-2716 Bath County
P-6335 North Anna

VIA Electronic Mail

Mr. Robert Sauer
Vice President
Power Generation System Operations
Dominion Generation
robert.w.sauer@dominionenergy.com

Subject: Consolidated Owner's Dam Safety Program (ODSP) Development and External Plan and Schedule

Dear Mr. Sauer:

Your September 17, 2024, submittal provided a plan and schedule for the continued development of a consolidated ODSP occurring along with an external audit of the ODSP. The submittal included qualifications of your proposed auditor. You submitted this in response to our July 19 and July 22, 2024, letters.

We have reviewed the plan and schedule and external auditor qualifications and find them acceptable. You plan to submit the external audit by September 30, 2025.

Your ODSP is an important factor in maintaining the safety of your dam(s) and

preventing a dam failure. As an owner of a high hazard potential dam, FERC requires that you develop and maintain an ODSP and complete an internal review of your ODSP each year. Additionally, 18 CFR §12.65 requires that your ODSP undergo an external audit every five years.

The enclosure provides general questions to be addressed by the auditor but should not be considered all inclusive.

File your future ODSP submittals above using the Commission's eFiling system at <https://www.ferc.gov/ferc-online/overview>. When eFiling, select Hydro: Dam Safety and Atlanta Regional Office from the eFiling menu. The cover page of the filing must indicate that the material was eFiled. For assistance with eFiling, contact FERC Online Support at FERCOnlineSupport@ferc.gov, (866) 208-3676 (toll free), or (202) 502-8659 (TTY).

We appreciate your continued effort in maintaining this document. The ODSP is a living document that will require revision from time to time. As you make revisions, please re-submit the completely revised ODSP to the Commission using the eFiling guidance above. If you have any questions, please contact me at (678) 245-3070 or by email at: william.brown2@ferc.gov.

Sincerely,

William J. Brown, P.E.
Regional Engineer

Enclosure

Cc: VIA Electronic Mail

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- 1) The audit must evaluate the Licensee's organizational structure and compare current staffing levels for all activities (i.e., general civil engineering vs. dam safety engineering) with necessary dam safety activities. If the audit finds insufficient staffing levels, the report must include recommendations to meet both short and long-term dam safety needs of the project(s).
- 2) Control Room and Remote Operations
 - a. Evaluate Operator training procedures and certification process.
 - b. Evaluate training procedure related to operations and public safety.
 - c. Evaluate if current staffing levels are appropriate.
 - d. Evaluate redundancy of control room operations and protocols to switch to local control of project features.
- 3) Management Policies and Expectations
 - a. Evaluate if energy production or other business objectives have compromised dam safety or regulatory compliance.
 - b. Evaluate if performance measures place significant accountability for dam safety and regulatory compliance.
- 4) Program Quality Elements
 - a. Evaluate written procedures to perform and document dam inspections.
 - b. Review Surveillance and Monitoring Plans and instrumentation calibration program.
 - c. Review procedures in-place used to evaluate and prioritize maintenance requirements.
- 5) Chief Dam Safety Engineers (CDSE) Responsibilities and Authority
 - a. Evaluate the qualifications of the CDSE.
 - b. Evaluate if the site inspection schedule by CDSE is well defined and appropriate.
 - c. Evaluate if the level of CDSE oversight of EAP, DSSMP, DSSMR and PSP are appropriate and well-defined in terms of responsibility.
 - d. Evaluate if the Licensee is implementing an appropriate in-house dam safety inspection program.
 - e. Evaluate the scope of the CDSE's responsibilities related to dam safety and other non-safety related activities.
- 6) Training
 - a. Evaluate the effectiveness of the internal and/or external training programs for all staff.
 - b. Evaluate qualifications of all staff to identify potential dam safety issues.
- 7) Hydro Facility Maintenance
 - a. Evaluate the effectiveness of the maintenance program including gates, penstocks, embankments, concrete structures, and general maintenance.

- 8) Assess Tracking System for Dam Safety Compliance Tasks
 - a. Assess compliance tracking system and retention of records.
 - b. Review outstanding Part 12 D Independent Consultant and FERC recommendations to assure they are being properly tracked and implemented.
- 9) The Audit must include interviews with representative employees involved in all aspects of the ODSP including field personnel, operators, control room staff, and all levels of management.
- 10) Final Report
 - a. Findings
 - b. Conclusions
 - c. Recommendations
 - d. Certification of report.
 - e. Submit Final Report to Licensee