ORIGINAL PCWA-L-221

Placer County Water Agency

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OFFICE OF THE SECRETARY

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FEDERAL ENERGY REGULATORY COMMISSION

August 26, 2005

Office of the Secretary
Federal Energy Regulatory Commission
888 First Street, Northeast
Washington D.C. 20426

RE: Project No. 2079-CA

Dear Secretary:

In accordance with the orders we received on August 1, 1989 from J. Mark Robinson, Director, Division of Project Compliance and Administration, seven copies of this letter are being mailed to you concerning a violation that occurred at Interbay Dam on July 19, 2005. Article 37 of the license requires that 23 cfs, or the natural inflow, whichever is less, be released during a normal water year, or 12 cfs, or the natural inflow, whichever is less, be released during a dry year. Normal water year release requirements have been in effect since June 1, 1995. The natural inflow is recorded at a gaging station named "Middle Fork American River Above Middle Fork Powerplant, USGS Gage No. 11427760, which is located 300 feet upstream from Middle Fork Powerplant. The release at Interbay Dam is recorded by a magnetic flowmeter on a 24 inch diameter stream maintenance release pipe through the dam. Interbay Dam is located on the Middle Fork American River about 2000 feet downstream of the powerplant.

On July 19, 2005, one of our employees and a representative of an environmental consulting firm that is helping gather data for relicensing traveled to Interbay Dam to service a water temperature sensor and data logger that had been installed in 2003 about 100 to 150 feet downstream from the dam near the left side of the river, looking downstream. To access the sensor and data logger required the representative to descend a ladder and stairway to the base of the dam, go past an area where the stream maintenance flow is discharged, and climb over boulders and rocks for 100 to 150 feet in order to arrive at the location where the sensor and data logger are installed. Enclosed are four photographs taken on August 10, 2005 which show Interbay Dam from the downstream side, the stream maintenance works from the downstream side, and the stream maintenance works from the upstream side.

When the sensor and data logger were installed in 2003, the stream maintenance release was being made through a radial gate rather than through the stream maintenance outlet works. This allowed field workers to safely get past the stream

maintenance outlet works. A rock slide of 200 to 300 cubic yards of rock that occurred in December, 2002, destroyed the magnetic flowmeter signal converter, conditioner and transmitter electronics. At that time, the stream maintenance release was switched to a radial gate. Then a second slide of about 4,500 to 7,500 cubic yards of rock occurred in April, 2003, beginning at the downstream toe of the dam and continuing downstream for a couple of hundred feet. After all slide remediation work had been completed and the magnetic flowmeter and stream maintenance release outlet works had been restored to service, the stream maintenance release was switched from the radial gate to the stream maintenance outlet works in early December, 2004.

With a release of about 24 cfs from the stream maintenance release works, the representative could not safely get past the release works in order to make his way downstream to service the water temperature sensor and data logger. The employee reduced the stream maintenance release to about 1/3 its rate which allowed the representative to get past the outlet works. The employee also accompanied the representative past the outlet works and on downstream toward the location where the water temperature sensor and data logger were located.

During the fact gathering after this incident, we learned that the employee was under the impression that as long as the stream maintenance release was above the minimum required release each time the data logger read and recorded the release, which is every 15 minutes, no violation was occurring. However, on the day of the incident, as the employee was following the representative over the boulders and rock downstream of the outlet works, he remembered that he needed to return and increase the stream maintenance release to its normal amount. The employee returned to where the valves are located that control the stream maintenance release and increased the release to its normal amount (over 23 cfs). He then went to a phone and called the Senior Operator and notified him of what was happening. He also apologized to the Senior Operator for going ahead and reducing the flow without first consulting with the Senior Operator and letting him know the situation.

The Senior Operator is normally at Ralston Powerhouse during the day Monday through Friday. Although the powerhouses are normally controlled from a PG&E powerhouse located about 50 miles from the Project, there is a SCADA computer at Ralston Powerhouse which allows an operator to keep track of project-wide operating data and to also start, stop, load and unload the units at the powerhouses if the communications path to the PG&E powerhouse is down. On the morning of the incident, a low flow alarm from Interbay Dam was received at Ralston Powerhouse and the Senior Operator recorded the stream maintenance release at 8.04 cfs. He tried to contact someone by radio but was unsuccessful. He then dispatched another operator to drive to Interbay Dam to find out what was the cause of the alarm. However, while the operator was on his way to Interbay Dam, the Senior Operator received the phone call from the employee who was at the dam with the representative and who explained to the Senior Operator the reason for the alarm.

Enclosed is a copy of the data logger readings taken every 15 minutes on July 19,

2005, of the flow measured by the magnetic flowmeter. As can be seen, all flows logged are above 23 cfs except for the flow logged at 9:00 a.m., which was 8.03 cfs. When the representative finished servicing the water temperature sensor and data logger, the employee reduced the flow so the representative could get by the stream maintenance area of discharge. As soon as the representative was past that area, the release was returned to normal. The time interval of the second reduction of the release was between 15 minutes readings and it was therefore not logged.

In reviewing this incident with the employee, it was explained that the required release is a continuous requirement. The importance of communicating with the operations department and receiving their approval before changing stream flow releases was also emphasized. In this case, a radial gate could have been opened and an entry made in the operator's log when the radial gate was opened, which radial gate was opened, why it was opened, approximately how much it was opened and how long it was opened. This would have prevented any violation of the minimum flow requirement. If a need arises in the future, every effort will be undertaken to modify current water temperature monitoring data downloading procedures and protocols such that the instream minimum releases will be maintained. The possibility of relocating the water temperature monitoring site to a nearby location with different access will be assessed and the site will be moved if deemed feasible.

If you have any questions, please call me at (530) 885-6917, or you may send me an email at sjones@pcwa.net.

Sincerely,

PLACER COUNTY WATER AGENCY

Stephen J. Jones
Power System Manager

cc: David Breninger
Larry Corsini
Philip Scordelis
Edward Tiedemann
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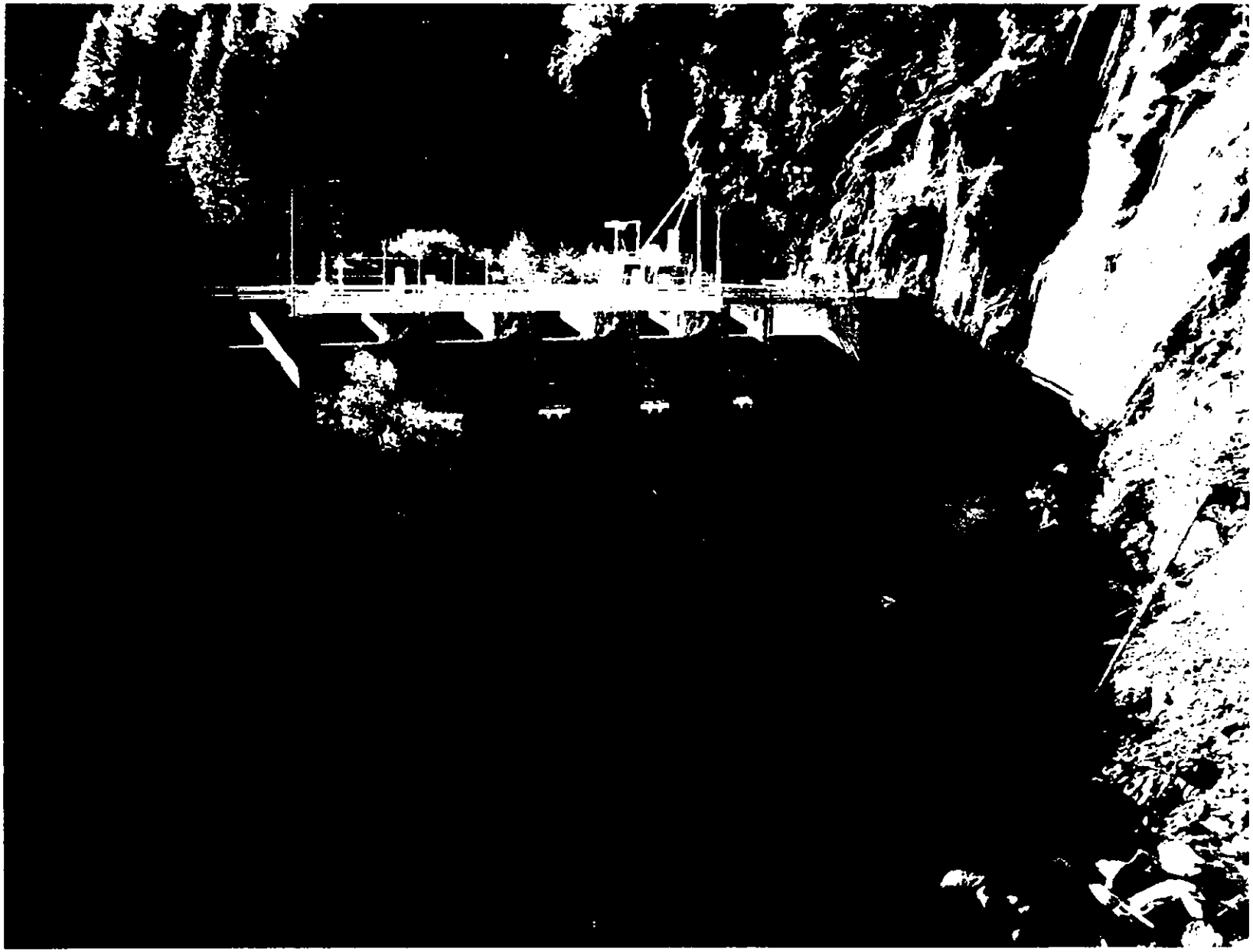

7/19/2005 3:30	23.92
7/19/2005 3:45	23.81
7/19/2005 4:00	23.96
7/19/2005 4:15	24
7/19/2005 4:30	24.45
7/19/2005 4:45	23.78
7/19/2005 5:00	23.58
7/19/2005 5:15	23.49
7/19/2005 5:30	23.84
7/19/2005 5:45	23.7
7/19/2005 6:00	23.88
7/19/2005 6:15	23.43
7/19/2005 6:30	23.96
7/19/2005 6:45	23.95
7/19/2005 7:00	23.81
7/19/2005 7:15	24.22
7/19/2005 7:30	23.93
7/19/2005 7:45	23.91
7/19/2005 8:00	23.96
7/19/2005 8:15	23.93
7/19/2005 8:30	23.79
7/19/2005 8:45	24.49
7/19/2005 9:00	8.03
7/19/2005 9:15	28.84
7/19/2005 9:30	24.04
7/19/2005 9:45	24.43
7/19/2005 10:00	24.14
7/19/2005 10:15	24.01
7/19/2005 10:30	24.24
7/19/2005 10:45	24.13
7/19/2005 11:00	24.33
7/19/2005 11:15	24.16
7/19/2005 11:30	23.72