FEDERAL ENERGY REGULATORY COMMISSION
Office of Energy Projects
Division of Dam Safety and Inspections – San Francisco Regional Office
901 Market Street, Suite 350, San Francisco, California 94103
(415) 369-3300 Office (415) 369-3322 Facsimile

November 29, 2005

In reply refer to:
Project No. 2079
NATDAM Nos. CA 00856,
CA00857

Stephen J. Jones, Power System Manager
Placer County Water Agency
24625 Harrison St
P.O. Box 667
Foresthill, CA 95631

Re: Independent Consultant's Safety Inspection Report Due by November 1, 2006

Dear Mr. Jones:

The Eighth consultant's safety inspection reports, to be prepared by an independent consultant for the French Meadows and Hell Developments of the Middle Fork Project, FERC Project No. 2079, are due by November 1, 2006. Three copies of the reports are to be sent to this office by this due date. Part 12, Subpart D (12-D), of the Commission's Regulations prescribes the scope of the inspection and evaluations to be performed, and the information that must be contained in the report.

For your information, a working group, comprised of Licensees, FERC staff and independent consultants that prepare Part 12 inspection reports finalized the Commission's new Dam Safety Performance Monitoring Program (DSPMP). This includes new procedures for the Part 12 Independent Consultant's Safety Inspection and Report and guidance concerning the contents of the Supporting Technical Information (STI), previously known as Appendix D. Chapter 14 of the engineering guidelines with the details of the DSPMP is posted on the following website:

http://www.ferc.gov/industries/hydropower/safety/dspmp.asp

You should review the requirements found in Chapter 14 of the Engineering Guidelines and plan for the development of the STI report between now and the time it is needed for the next Part 12D Inspection and the Potential Failure Mode Analysis.

An important new feature of DSPMP is called Potential Failure Modes Analyses (PFMA). We have traditionally used PFMA to varying degrees throughout the dam safety program, but now especially since the dams are older (20 years to over 100 years old), we have established this as a formal process to make certain that project dams and structures are monitored for their critical potential failure modes and continue to perform adequately and safely. The DSPMP with a PFMA will systematically identify the possible ways a dam or structure could potentially fail and make certain that it has been properly evaluated using all available data with up-to-date knowledge and experience. The results of the PFMA will assist everyone involved in making certain that the dams are being adequately monitored and to evaluate present and future performance.

You will notice the changes and additional coordination needed between your staff, the independent consultant, and our staff as you review the enclosures with this letter and as you review Chapter 14. An important matter in conducting the PFMA is the need to obtain the services of a person to fulfill the responsibilities of a PFMA facilitator. The facilitator will oversee and direct the potential failure modes analysis process and PFMA report preparation by the independent consultant. The PFMA facilitator should be a civil engineer with a broad background and experience in dam safety engineering and experience in performing a PFMA similar to that described in the guidance in Chapter 14, Dam Safety and Performance Monitoring Program.

A basic recommended qualification for the facilitator is that the proposed facilitator for a project should have participated in an actual PFMA of the nature described in these guidelines. Qualifying experience for a facilitator is participation as a core team member of a PFMA or actually facilitating a PFMA. This ensures that the person leading the PFMA process knows not only how the process is carried out, but also is aware of what can be accomplished. This is especially critical if the other core team members have not been through a PFMA, which may often be the case.

As an alternative to actual experience participating in or facilitating a PFMA, the proposed facilitator should have attended a FERC sponsored Dam Safety Performance Monitoring Program Training Workshop. FERC will periodically provide training workshops to help develop facilitators, especially during the implementation phase of this new program. It is important to understand that if the PFMA facilitator does not accomplish the goals of the PFMA, which is identifying and obtaining a clear understanding of each dam site's specific potential failure modes, we may require that the PFMA be supplemented or redone entirely.

You must obtain approval of your proposed independent consultant(s) prior to the initiation of the inspection. You should send three copies of your letter requesting approval of the consultant (with the proposed consultant's detailed résumé) to:

Mr. Constantine G. Tjoumas, P.E., Director
Division of Dam Safety and Inspections (D2SI), OEP
Federal Energy Regulatory Commission
888 First Street, N.E., Room 6N-01
Washington, D.C. 20426

One copy of the letter and résumé should also be sent to this office (San Francisco). As required by our Regulations, the request for the approval of the independent consultant and his/her résumé are to be filed at least 60 days prior to the initiation of the safety inspection. In order to allow your consultant adequate time to inspect your project and prepare the reports, we request that you submit the copies of the request letter and resume(s) at least six months before the report is due, that is by May 1, 2006.

The Commission's Regulations require that the project works of a development subject to 12-D, must be inspected and analyzed periodically by an independent engineering consultant. This includes all dams and generally all principal works of the development. The following dams and appurtenant water retaining structures require inspection at this Project:

- L.L. Anderson Dam
- Hell Hole Dam

Enclosure 1 is the outline that establishes the format to be followed for preparation of the independent consultant's safety inspection report. Stability and stress analyses of representative structural sections must be analyzed or have been previously analyzed under all credible loading conditions. This information will now be located in the "Supporting Technical Information" document, which you are responsible for preparing or having prepared. Acceptable technical criteria are prescribed in FERC's publication titled, Engineering Guidelines for the Evaluation of Hydropower Projects. If needed, this publication can be ordered from the Commission's Division of Public and Intergovernmental Affairs, at (202) 502-6088 or downloaded from our website at:

http://www.ferc.gov/industries/hydropower/safety/eng-guide.asp

Section 7 of the 12-D Report will contain your consultant's assessment of the STI. The studies and evaluations that form the basis for his conclusions should be summarized. When your consultant bases conclusions on the content of previous reports and studies, the consultant must provide a clear and comprehensive statement of concurrence or non-concurrence with the methodology, assumptions and conclusions of those reports and studies. Reasons for non-concurrence must be explained and may require an analysis by the consultant to show the effects on factors of safety of the structures.

The STI document contains much of the data that was asked for in Appendix D of previous Part 12D reports. Enclosure 2 is the outline for the STI. The information is to be provided in a summary style format. The data asked for in the STI does not include lengthy computer printouts with all the details of a program run. For guidance on what is to be included in the STI and examples of STI documents, see Appendix I of Chapter 14 Dam Safety and Performance Monitoring Program. The outline as given in Appendix I should be followed for STI and if some sections do not apply, they should be labeled as "Not Applicable."

The consultant's report may be rejected if the STI is incomplete, significantly deficient, or unreadable. If your consultant makes specific recommendations in the report, Section 12.39 of the Commission's Regulations requires that you submit to us, within 60 days of the date the report is filed, your plan of action and schedule to satisfy these recommendations. Your plan of action may include any proposal, including taking no action, that you consider a preferable alternative to any corrective measures recommended by the consultant in the report. However, any proposed alternative must be supported by complete justification and detailed analysis and evaluation in support of that alternative.

If there are any questions regarding the report requirements, please contact Mr. John Onderdonk at (415) 369-3339.

Sincerely,

TAKESHI YAMASHITA

Takeshi Yamashita, P.E.
Regional Engineer

Enclosures:
1. Independent Consultant's Inspection Report Outline [dated 07-01-2005]
2. Supporting Technical Information Document Outline [dated 07-01-2005]