



August 20, 2014

Mr. William H. Allerton, P.E.
Director, Division of Dam Safety and Inspections
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: Comments on Proposed Annual Chief Dam Safety Engineer Statement

Dear Mr. Allerton,

Thank you for the opportunity to review and comment on the Division of Dam Safety and Inspection's (D2SI) draft "Submittal of Annual Statement from Chief Dam Safety Engineer (CDSE) in DSSMR" letter. The Hydraulic Power Committee (HPC) appreciates the early collaboration between licensees and D2SI on initiatives such as these. We look forward to continuing this collaboration in the future.

I. Summary of Comments

As dam owners and/or members of the dam safety community, we have the greatest vested interest in the continued safe operation of the structures under our oversight. We also appreciate the continued efforts of the D2SI to improve the Commission's dam safety program through the advancement of a learning environment and the guidance provided to its Licensees. As such and in that spirit, the members of the HPC have concerns with the current form of your proposed improvements to the D2SI's dam safety program, and appreciate this opportunity to voice them to you:

- It is important for us to start by noting that the HPC is not opposed, in general, to the concept of an Annual Statement being included in our annual Dam Safety Surveillance and Monitoring Reports (DSSMRs). The Annual Statement, however, should be crafted with the understanding that conditions or Potential Failure Modes (PFMs) undetected or otherwise outside of our knowledge (or the knowledge of our dam safety staff, dam safety consultants, and dam safety regulators) may exist. These potential vulnerabilities could be present and unaccounted for despite best efforts on the collective parts of our dam safety programs to monitor, evaluate, analyze, and inspect our facilities.

Conclusions as to the "safety" of our dams can only be based on what is known about the dams at the time of the review. The remaining uncertainty that is inevitable in any

review, evaluation or analysis makes us uneasy as it relates to a requirement for what could amount to a certification that a dam is safe beyond any doubt.

- On Page 1 of the draft letter, it is stated that, “This [CDSE Annual Statement] is to be based on a careful review of all the project information, including Licensee inspections, FERC inspections, Part 12D report including the Supporting Technical Information Document (STID), and Instrumentation and Monitoring Reports.” We are concerned that the inclusion of the wording ‘all the project information’ is too open-ended and potentially puts an unachievable burden on the CDSE or his/her staff/consultants.
- Later in the same paragraph, it is stated that, “An acceptable STID includes a summary of the major issues encountered during construction, engineering studies performed – including the original design analyses with an understanding of how the parameters used in the analyses were developed and a determination if the original design analyses meet today’s state-of-practice.” We are uncertain as to the intent of the use of the word ‘original’ in this statement.

It is likely the original analyses for many structures, particularly the older ones, are not available for review by the CDSE or his/her staff/consultants. Even if available, it is doubtful those analyses or the bases of the designs would meet the current state-of-practice. Considering the significant number of these structures that have been modified since initial construction, and the possibility of revised design parameters used in subsequent analyses, it is probable that the ‘original’ design analyses for a large number of structures would not be adequate and would not meet today’s state-of-practice.

- We propose the following language for the Annual Statement be considered: “Based on my personal knowledge and meetings and discussions with my engineering and operations staff and/or consultant(s), along with review of the DSSMR, Part 12 Inspection Report, Dam Safety Inspection(s), and Dam Safety Studies, I conclude that the subject dam(s) are considered to be safe for continued operation, with the following issues noted:...”
- Item 2 of the letter, including the attached Enclosure 1, provides details on FERC’s proposed additions to each licensee’s DSSMR, including tables that group PFMs and instrumentation. This new requirement, to be incorporated into each licensee’s 2015 DSSMR, will require a tremendous amount of work to initially develop and to maintain, particularly for those projects with numerous instruments associated with numerous PFMs. With this new requirement as written it appears that, for projects with comprehensive instrumentation and monitoring programs, the tables themselves could be more voluminous than the DSSMR in its current form.

The extensive effort necessary to meet this requirement could put a heavy burden on many licensees’ dam safety staffs and the requirement for its inclusion in 2015 DSSMRs

may not be practicable. We request that FERC reconsider this requirement's inclusion in your Annual Statement letter to licensees. The HPC would be glad to work with FERC to develop an alternative means of documenting instrumentation and monitoring performance that will not be as taxing to either licensees' dam safety staff or FERC staff responsible for their review.

II. Conclusion

The HPC appreciates the opportunity to review and comment on D2SI's draft Annual Statement submittal letter. Although our comments reflect concerns regarding your draft Annual Statement letter, licensees work closely with D2SI and FERC staff at headquarters and the regional offices and working together we are seeing improvements in dam safety. We look forward to continuing these relationships and commit to working with you in meeting your goals.

Respectfully submitted,



Linda Church Ciocci
NHA Executive Director

On behalf of

Scott Klabunde, Chair
Hydraulic Power Committee