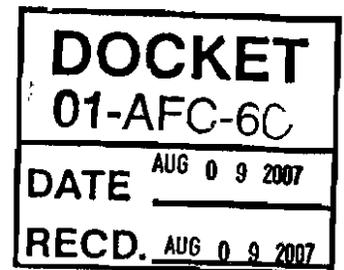


August 9, 2007

Christopher Meyer
Ron Yasny
Compliance Project Managers
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512



**Subject: PETITION FOR INSIGNIFICANT PROJECT CHANGE FOR
ADDITIONAL SAFETY PLATFORMS AT MAGNOLIA POWER
PROJECT (01-AFC-6)**

Dear Mr. Meyer and Mr. Yasney:

Enclosed for filing with the California Energy Commission are one original and 12(Twelve) copies of the **PETITION FOR INSIGNIFICANT PROJECT CHANGE FOR ADDITIONAL SAFETY PLATFORMS AT MAGNOLIA POWER PROJECT**. Specifically, the Petition demonstrates that the requested modifications do not result in new environmental impacts or require any modifications to the existing Conditions of Certification contained in the Final Decision. No additional lighting is proposed as part of this Petition and therefore, no modifications to the approved lighting plan are required.

All proposed additional platforms, stairs, and ladders will be hot-dipped galvanized to match the existing platforms, stairs, and ladders at Magnolia Power Project. The only portions to be painted are the steel members associated with the monorail (item 7) and the support structure for the silencer inspection platform (item 15) both of which will be mounted to the existing painted silencer support structure atop the HRSG. The new steel will be coated to match the existing painted silencer support structure steel.

If you have any questions, please do not hesitate to contact me at (916) 441-6575.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Galati', with a long horizontal flourish extending to the right.

Scott A. Galati
Counsel to SCPPA

**PETITION FOR INSIGNIFICANT PROJECT CHANGE
FOR
ADDITIONAL SAFETY PLATFORMS
AT
MAGNOLIA POWER PROJECT**

At Magnolia Power Project several areas have been identified where additional safety platforms are needed to improve operations and maintenance access to the process equipment. The areas are shown on the attached Site Plan (Drawing No. 010-G-002).

It is proposed to fabricate and erect fifteen (15) galvanized steel platforms to fulfill these needs. This petition for an insignificant project change is to allow the platforms to be added. A complete description of the additional platforms is contained in the drawings attached hereto as "Appendix A," and a discussion of the necessity for the addition of the safety platforms follows:

(A) Description of the proposed modifications:

- Items 1 thru 5: There are five (5) platforms proposed to allow access to doors in the CT Generator Compartment, CT Load Compartment, and CT Terminal Enclosure – these are platforms to access the west end of the Generator Collector Compartment, the doors on both the north and south sides of the Load Compartment between the Generator and the Turbine Compartments, and the doors on the east end of the terminal enclosure compartment. These platforms will include stairways, ladders, and catwalks as needed to facilitate access. (Historically, GE provide these platforms with their Combustion Turbine-Generator equipment, however, GE recently discontinued the practice of supplying platforms with their equipment.)
- Item 6. A stairway is proposed to replace an existing ladder on the northeast end of the platform accessing the forced circulation heat exchanger and belt press in the ZLD Area. Operators tend to this equipment multiple times per shift, so a stairway is appropriate
- Items 7 & 8. There are four vessels in the ZLD area (two Multi-Media Filters and two Weak Acid Cation Units) that require working platforms atop the vessels to change-out the media or resins inside the vessel beds. Although clips are provided for the attachment of ladders and platforms on these vessels, none were provided by the original equipment manufacturer. The frequency of changing the resins and media in these vessels necessitates addition of the working platforms.
- Item 9. A short monorail with a two-wheel trolley is needed – atop the HRSG - above the HR Outlet Safety Valve (1HR-PSV213 aka 120PV002A) to allow the mechanics to remove this safety valve periodically for maintenance.

- Item 10. A ladder is needed to access the top of the Turbine Compartment for maintenance of the fan modules up there.
- Item 11. Ladders and platforms are needed for access to three bypass valves located in the piping between the HRSG pipe rack and the STG Building. It is necessary for mechanics and instrumentation technicians to perform maintenance on these routinely.
- Item 12. Platforms with ladders are needed to access manways on the south side of the Condenser. This multilevel platform is needed to facilitate inspection, brushing, and air lancing of the condenser tubes, as needed to maintain cleanliness on the circulating water side of the tubing inside the Condenser. This platform will be erected inside of the STG Building.
- Item 13. A small platform with a ladder is needed to access the blower motor control boxes above the Gland Steam Condenser. The control panel needs to be routinely accessed by operations personnel. This platform will be erected inside of the STG Building.
- Item 14. A ramp is needed for access to the bridge crane platform inside the STG Building for necessary inspections and maintenance of the crane rigging. This platform will be erected inside of the STG Building.
- Item 15. A platform with ladder is needed for access to inspect the silencers atop the HRSG. This platform will be installed above the silencer support structure, and will be equipped with a ladder lock to prevent uncontrolled access. This one is the only proposed platform to be installed where it could be visible from outside the plant area. To mitigate visual impact this platform will be galvanized like the silencers, with supporting members painted the same color as the existing silencer support structure.

(B) A discussion of the necessity for the proposed modifications

The proposed additional platforms are to ensure safe access to the power plant process equipment. In the original design guidelines for the Magnolia Power Plant, platforms were to be provided wherever operations or maintenance access would be anticipated more frequently than once per year. Although many platforms were included originally, there are these fifteen areas where operations and maintenance personnel have found additional platforms are necessary. Without the adding the proposed platforms, there is higher risk of a personnel injury or loss of equipment operational reliability.

(C) 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 these additional platforms would be needed to safely maintain the power plant process equipment.

(D) 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 - fabrication and erection of additional platforms - does not change or undermine in any way the assumptions, rationale, findings, or other basis of the CEC Final Decision (01-AFC-6).

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

The additional platforms proposed will have no significant adverse impacts on the environment. The only possible impact identified is the potential visual impact of the proposed Silencer Inspection Platform atop the HRSG (Item 15 above). To mitigate any significant adverse visual impact, the platform is set-back from the periphery of the structure and is located mostly behind the existing silencers. To blend-in, the platform will be galvanized (like the silencers), and the supporting structure will be painted the same color as the existing silencer supporting structure. In Appendix A four perspective views are modeled to illustrate the appearance of the top of the HRSG (before and after the silencer inspection platform is added).

(F) 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.

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

The public will be able to see the silencer inspection platform if they look closely from adjacent to the plant site. However, due to the insignificance of the visual impact, the modification would most likely not be noticed by the public.

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

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

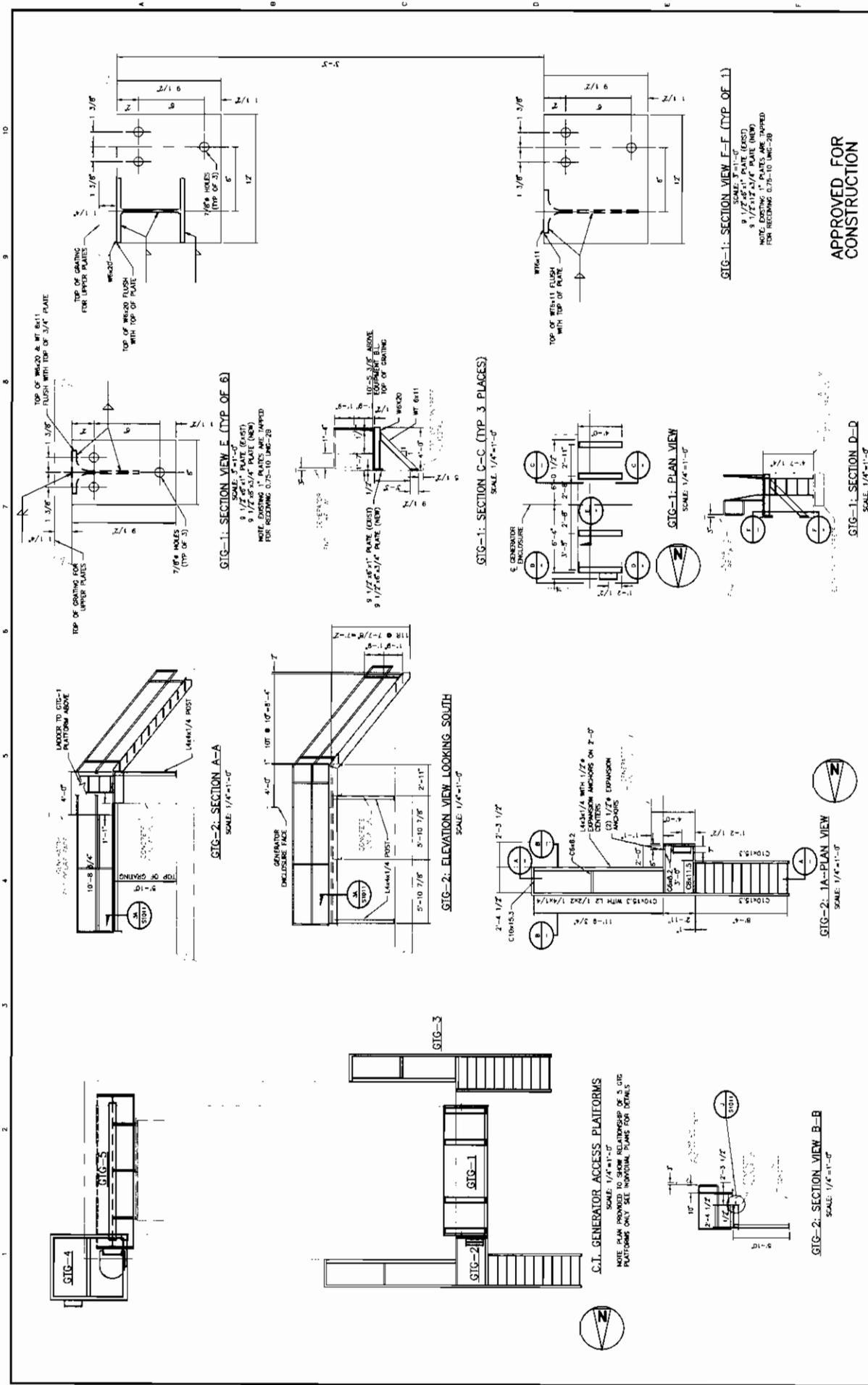
(I) A discussion of the potential effect on nearby property owners, the public and the parties in the application proceedings.

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

APPENDIX A

DRAWING & DOCUMENT LIST

<u>Drawing/Doc No.</u>	<u>Drawing or Document Title</u>
--010-G-002	MPP Site Plan [Annotated to Show Itemized Areas for Additional Platforms]
145348-S1000	Maintenance Access Platforms Erection Notes & Legend
145348-S1001	CT Generator Access Platforms Plans & Sections
145348-S1002	CT Generator Access Platforms Plans & Sections
145348-S1003	Steam Condenser Access Platforms Plans & Sections
145348-S1004	ZLD & Multi Media Filter Tank Access Platforms Plans & Sections
145348-S1005	C.T. Enclosure and PSV Maintenance Platforms Plans & Sections
145348-S1006	Weak Acid Cation Tank Access Platform Plans & Sections
145348-S1007	Bypass Valves Maintenance Access Platforms Plans & Sections
145348-S1011	Maintenance Access Platforms Typical Sections and Details
145348-S1012	Stairs & Landings Typical Details
145348-S1013	Maintenance Access Platforms Typical Sections & Details
145348-S1015	Turbine Room Crane Access Platform Steel Handrail & Plate Plans & Details
145348-S2000	Access Platforms – Grating and Handrail Plans & Sections
145348-S2001	Access Platforms – Grating & Handrail Plans & Sections
145348-S2002	Access Platforms – Grating & Handrail Plans & Sections
-----	Perspective Views [Showing Views Before & After Addition of Silencer Inspection Platform]



NO.	DATE	REVISIONS AND RECORD OF ISSUE	PROJECT NUMBER	ISSUE FOR CONSTRUCTION	PROJECT NAME	DATE	BY
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GTG-1: SECTION D-D
SCALE: 1/4"=1'-0"

GTG-2: 1A--PLAN VIEW
SCALE: 1/4"=1'-0"

GTG-2: SECTION B-B
SCALE: 1/4"=1'-0"

GTG-1: SECTION E-E (TYP. OF 1)
SCALE: 3/4"=1'-0"

GTG-1: SECTION F-F (TYP. OF 1)
SCALE: 3/4"=1'-0"

GTG-1: SECTION C-C (TYP. 3 PLACES)
SCALE: 1/4"=1'-0"

GTG-1: SECTION A-A
SCALE: 1/4"=1'-0"

GTG-1: PLAN VIEW
SCALE: 1/4"=1'-0"

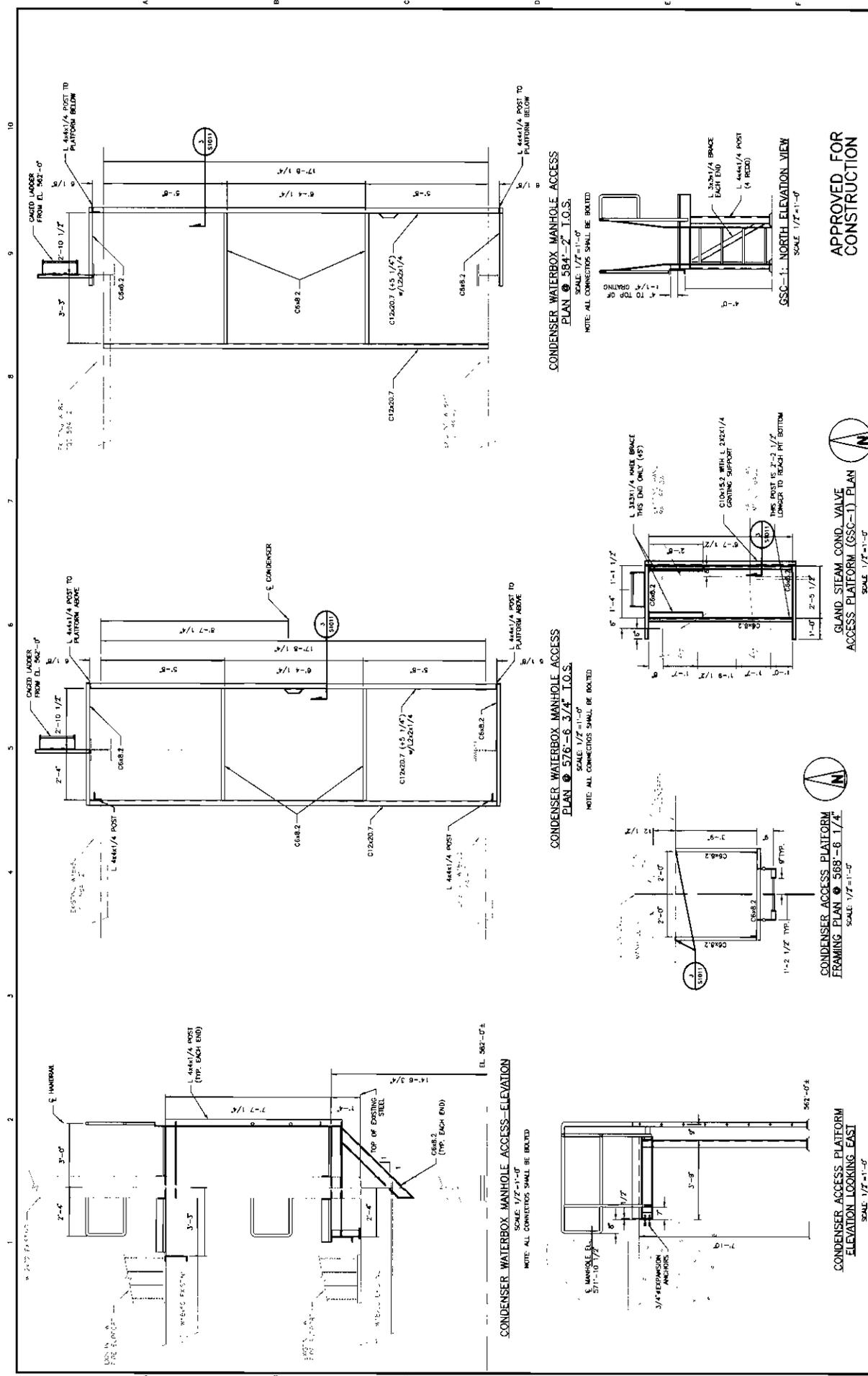
GTG-2: ELEVATION VIEW LOOKING SOUTH
SCALE: 1/4"=1'-0"

GTG-3

GTG-4

GTG-1

GTG-2



CONDENSER WATERBOX MANHOLE ACCESS PLAN @ 584'-2" I.O.S. SCALE: 1/2"=1'-0"		CONDENSER WATERBOX MANHOLE ACCESS PLAN @ 576'-6 3/4" I.O.S. SCALE: 1/2"=1'-0"		CONDENSER WATERBOX MANHOLE ACCESS PLAN @ 584'-2" I.O.S. SCALE: 1/2"=1'-0"		CONDENSER WATERBOX MANHOLE ACCESS PLAN @ 576'-6 3/4" I.O.S. SCALE: 1/2"=1'-0"		CONDENSER ACCESS PLATFORM FRAMING PLAN @ 588'-6 1/4" I.O.S. SCALE: 1/2"=1'-0"		CONDENSER ACCESS PLATFORM ELEVATION LOOKING EAST SCALE: 1/2"=1'-0"		CONDENSER ACCESS PLATFORM NORTH ELEVATION VIEW SCALE: 1/2"=1'-0"	
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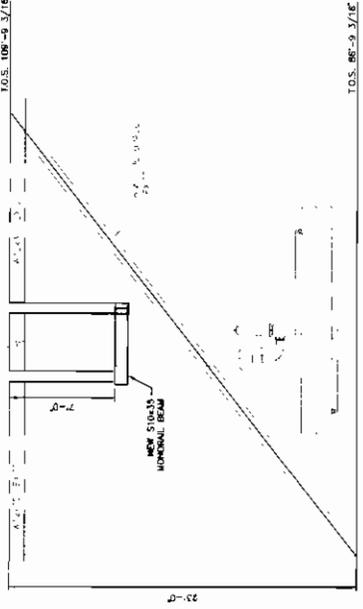
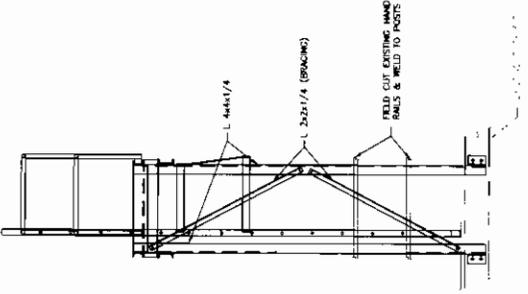
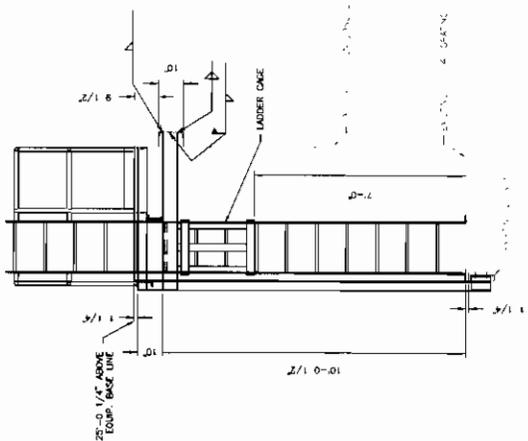
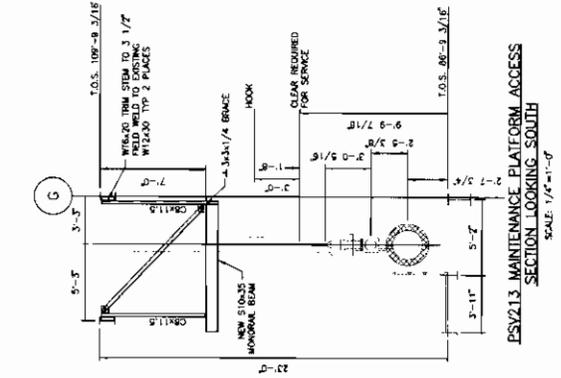
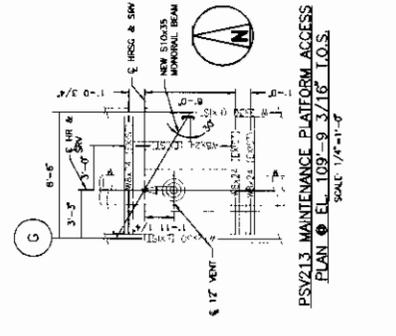
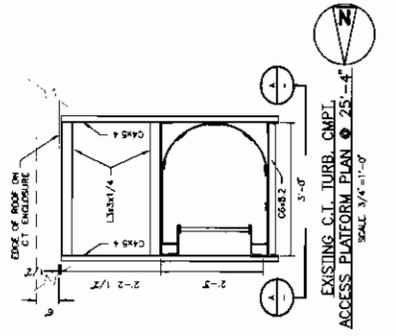
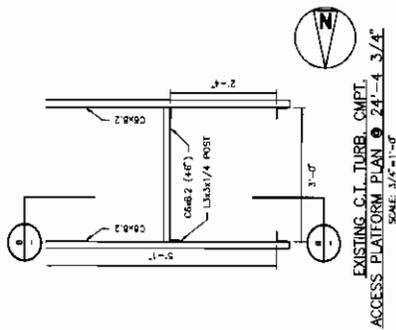
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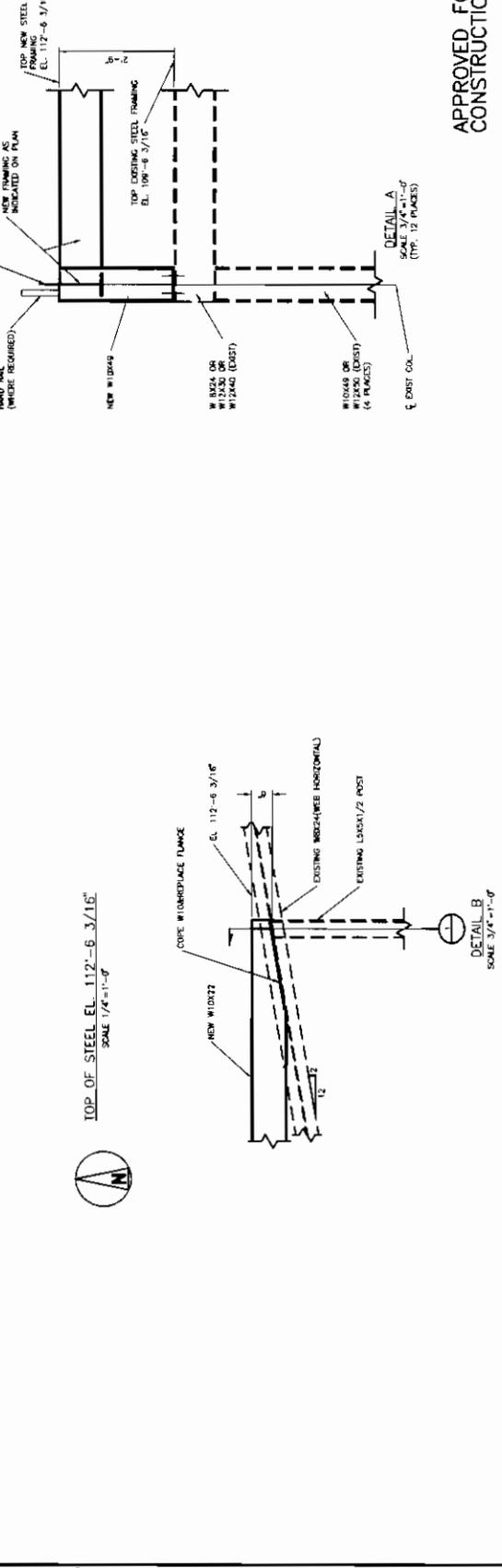
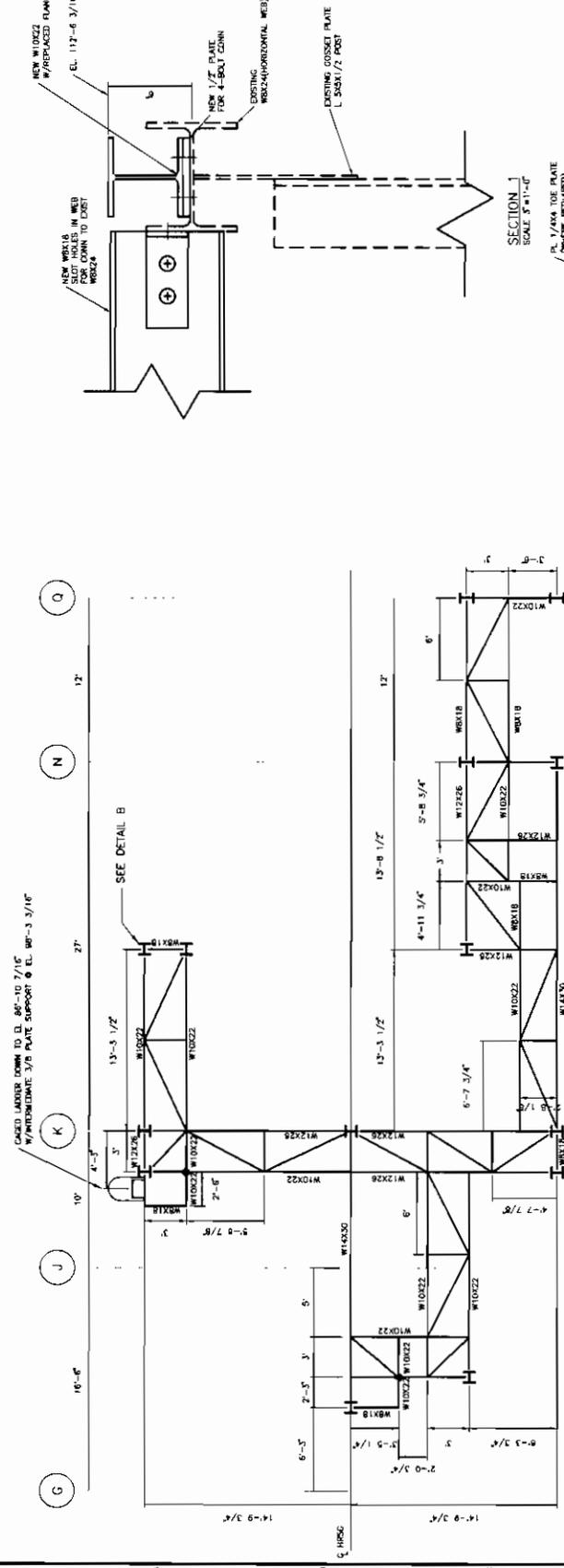
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								BLACK & VEATCH CORPORATION			
								DESIGNED	L. HARRIS	DATE	10/24/06
								CHECKED	A. WELLY	DATE	10/24/06
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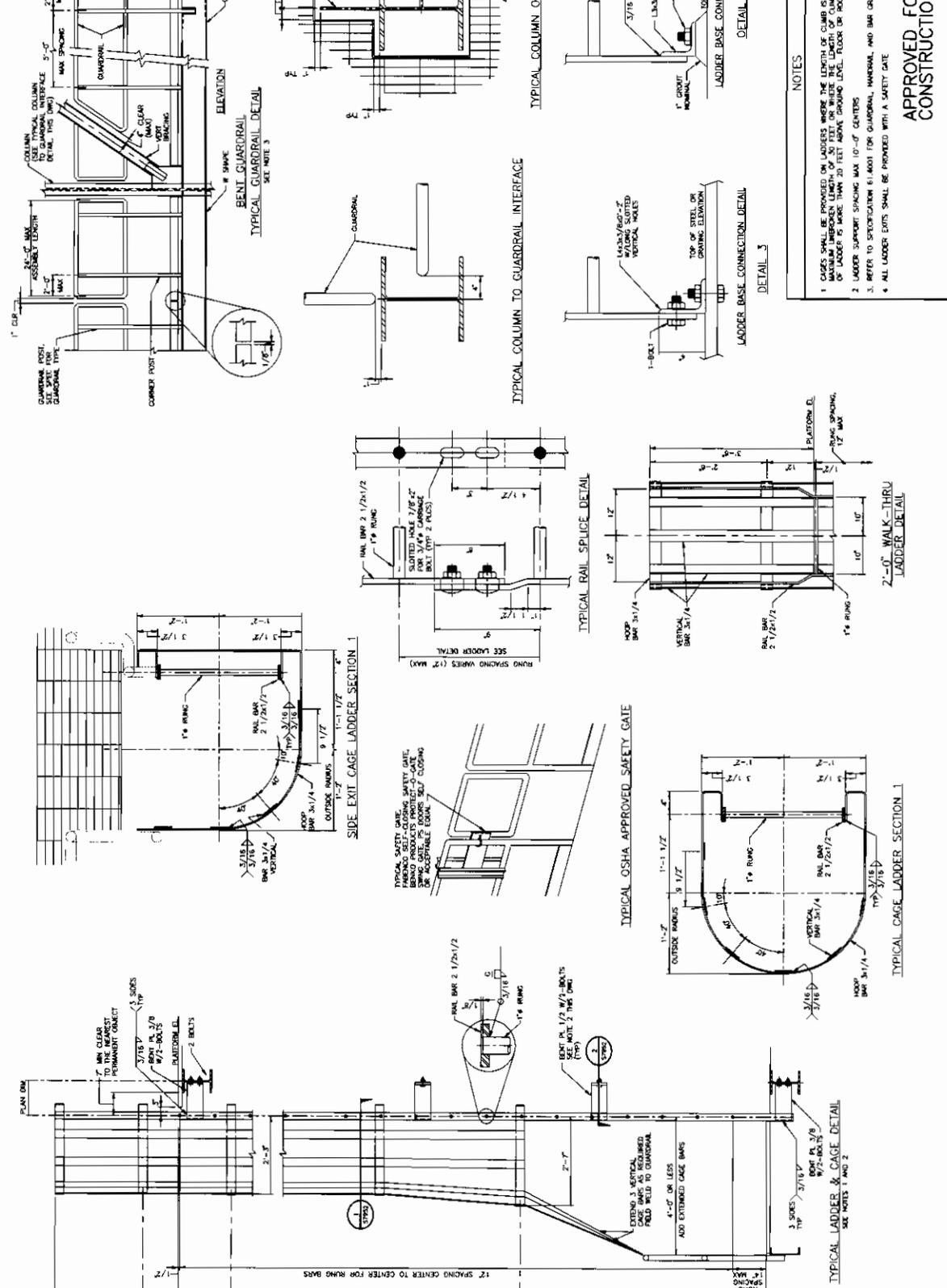
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SHEETS: ACCESS PLATFORM FOUND AND SECTIONS		DATE: 11/16/08	REVISION NUMBER: 0
BLACK & VEATCH ENGINEERS ARCHITECTS & CONSTRUCTORS		DATE: 11/16/08	REVISION NUMBER: 0
L. BURBANK POWER & WATER MAGNOLIA POWER PLANT STATE OF CALIFORNIA PROJECT NO. 133023		DATE: 05/08/2007	REV. NO. 10000
ISSUE FOR CONSTRUCTION		DATE: 05/08/2007	REV. NO. 10000
REVISIONS AND RECORD OF ISSUE		DATE: 05/08/2007	REV. NO. 10000

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NOTES

1. CAGES SHALL BE PROVIDED ON LADDERS WHERE THE LENGTH OF CLIMB IS MORE THAN 15 FEET TO A MAXIMUM FREQUENT LENGTH OF 30 FEET OR WHERE THE LENGTH OF CLIMB IS LESS THAN 20 FEET BUT TOP OF LADDER IS MORE THAN 20 FEET ABOVE GRADE LEVEL FLOOR OR ROOF.
2. LADDER SUPPORT SPACING MAX 10'-0" CENTERS.
3. REFER TO SPECIFICATION 6.1.001 FOR GUARDRAIL, HANDRAIL, AND RAIL GRATING TYPE AND SIZE.
4. ALL LADDER ENDS SHALL BE PROVIDED WITH A SAFETY GATE.

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BURBANK POWER & WATER
MAGNOLIA POWER PLANT

PROJECT: 145348-S1013

DATE: 02/09/2007

ISSUE FOR CONSTRUCTION

REVISIONS AND RECORD OF ISSUE

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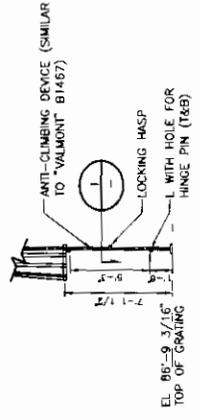
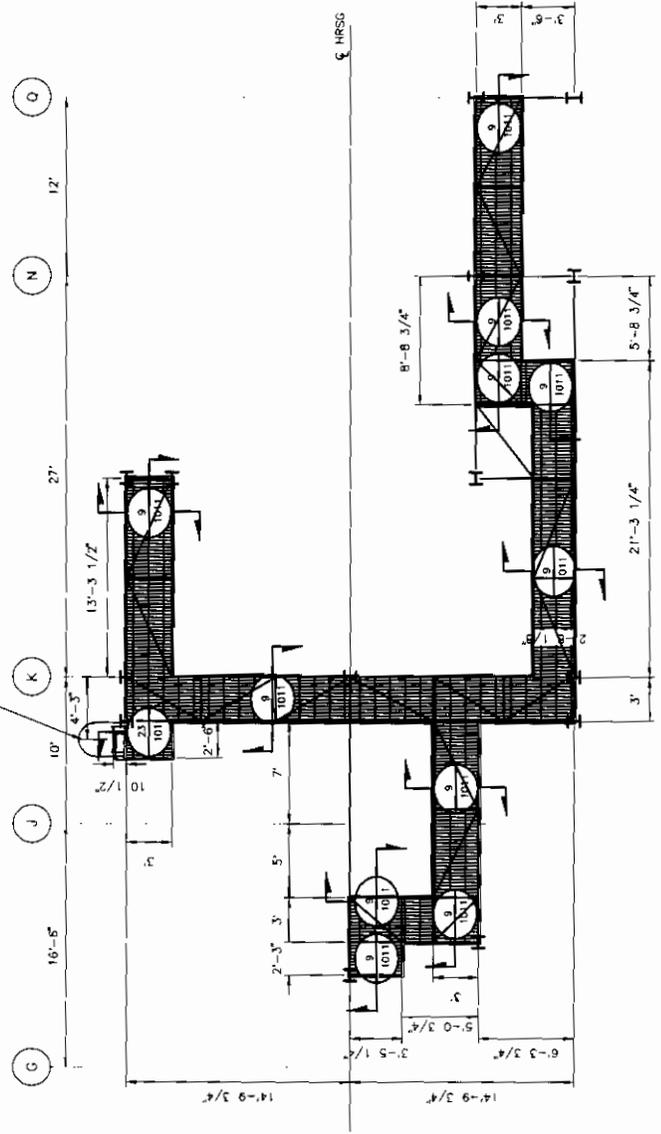
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NO.	DATE	ISSUE FOR CONSTRUCTION	REVISIONS AND RECORD OF ISSUE
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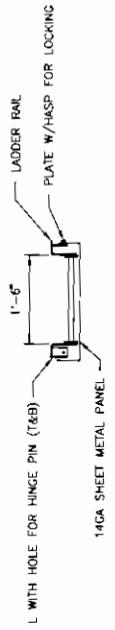
BLACK & VEATCH
ENGINEERS, ARCHITECTS, ENVIRONMENTAL SCIENTISTS AND PLANNERS
145348-S1013
MAGNOLIA POWER PLANT
BURBANK, CALIFORNIA
DATE: 02/09/2007
REV: 0

10 9 8 7 6 5 4 3 2 1

CAGED LADDER DOWN TO EL. 86-10
7/16" (TOP OF GRATING)
LADDER RAILS SHALL BE L3X2X3/8
LADDER BASE DETAIL 3 ON ST013



ELEVATION - LADDER ANTI-CRIMP DEVICE
SCALE 1/4"=1'-0"



SECTION J
SCALE 1/4"=1'-0"

TOP OF GRATING EL 112'-7 3/16"
SCALE 1/4"=1'-0"

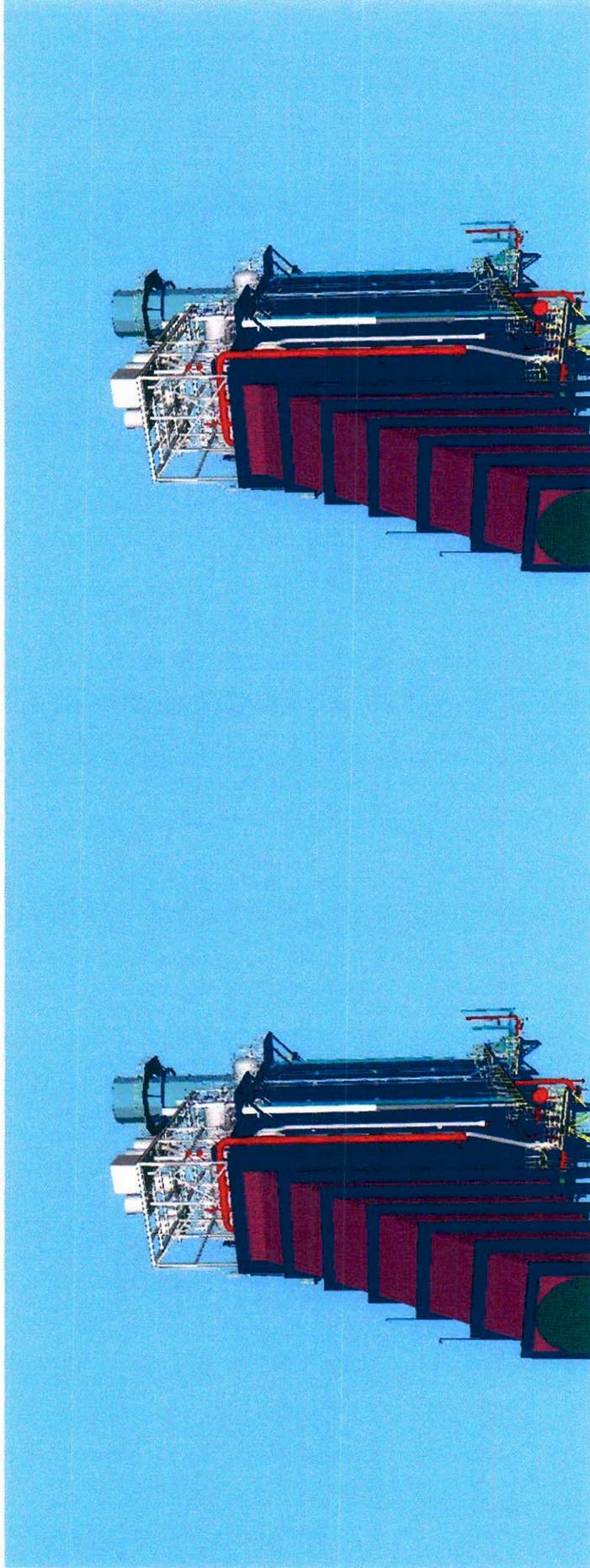


APPROVED FOR CONSTRUCTION

PROJECT: BURBANK POWER & WATER MAGNOLIA POWER PLANT		DRAWING NUMBER: 145348-S2002	REV: 0
ACCESS PLATFORMS, GRATING AND HANDRAIL PLANS AND SECTIONS		DATE: 11/16/02	AREA:
BLACK & VEATCH CONSULTING ENGINEERS 1400 WEST 10TH AVENUE DENVER, CO 80202		DESIGNED BY: L. SOKKA CHECKED BY: M. WATTS DATE: 11/16/02	PROJECT NUMBER:
THE USER OF THIS DRAWING SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND FOR VERIFYING THE ACCURACY OF ALL INFORMATION PROVIDED BY THE USER OF THIS DRAWING. THE USER SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND FOR VERIFYING THE ACCURACY OF ALL INFORMATION PROVIDED BY THE USER OF THIS DRAWING.			
ISSUE FOR CONSTRUCTION: PROVISIONS AND RECORD OF ISSUE			
DATE:	DRAWN BY:	CHECKED BY:	PROJECT NUMBER:

**Magnolia Power Project
Silencer Inspection Platform**

Perspective View from Control Room



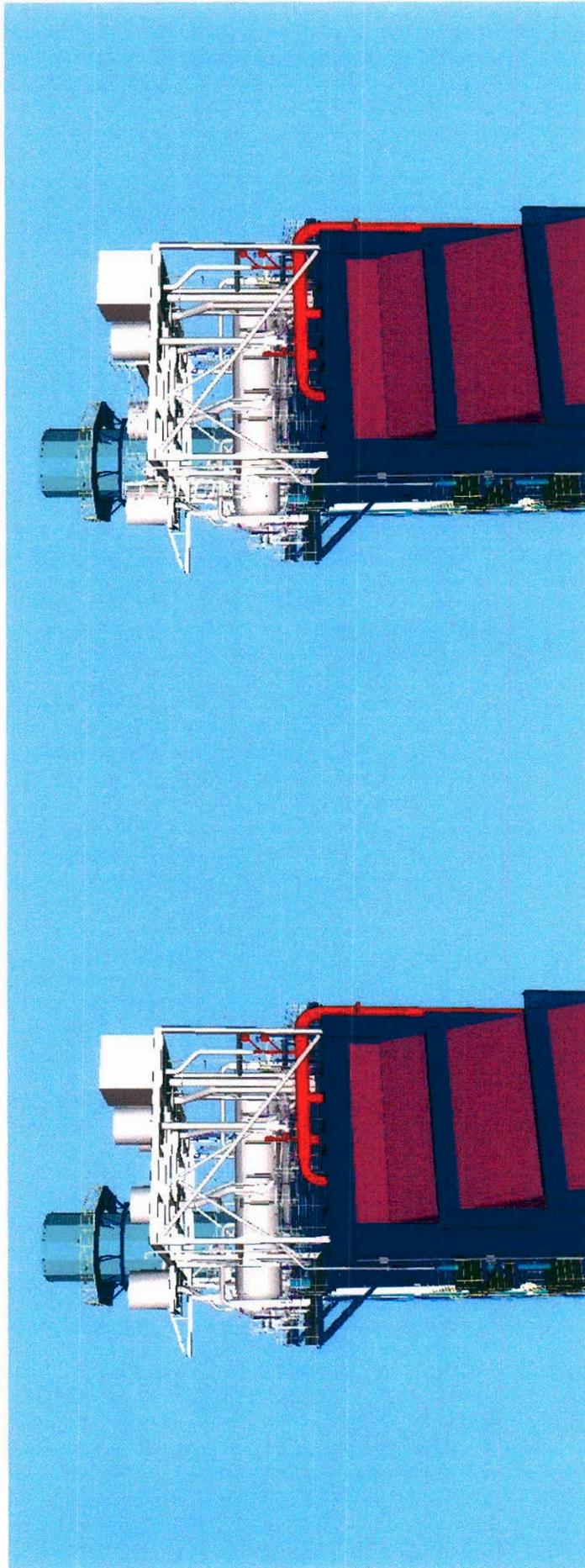
BEFORE PLATFORM

AFTER PLATFORM

❖ NOTE - Model HRSG colors do not resemble actual installed colors.

**Magnolia Power Project
Silencer Inspection Platform**

Perspective View from General Manager's Office



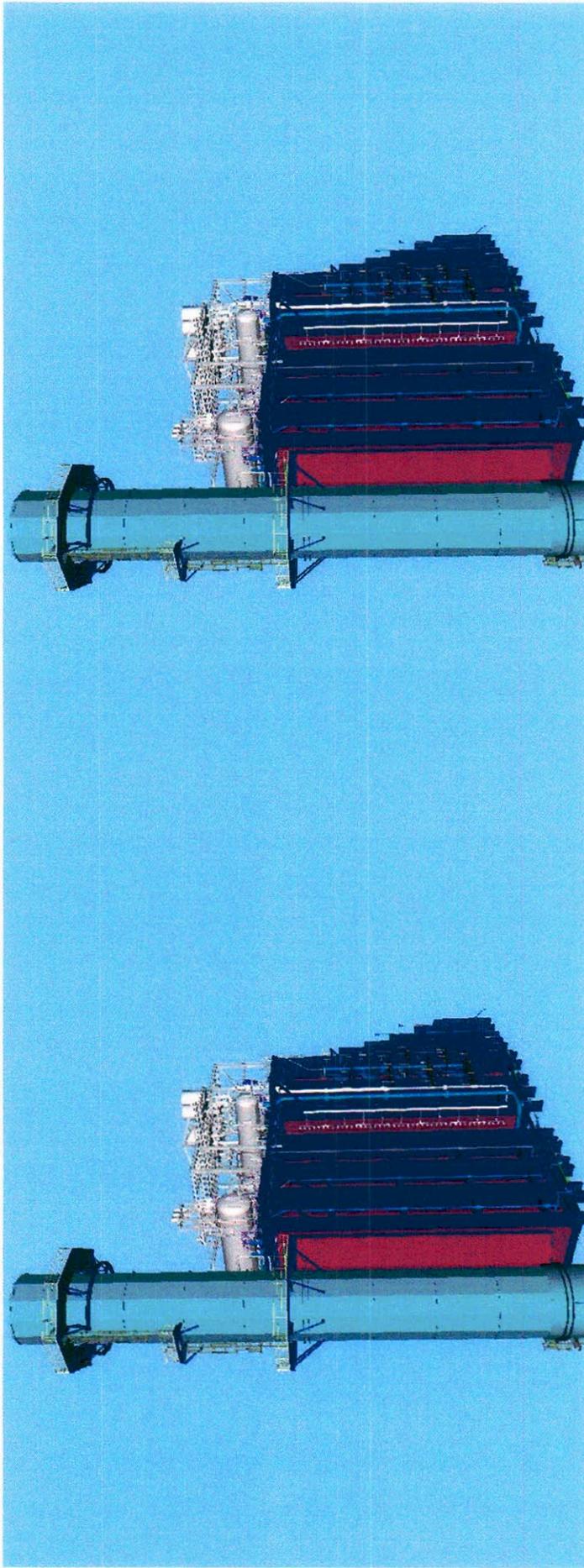
BEFORE PLATFORM

AFTER PLATFORM

❖ NOTE - Model HRSG colors do not resemble actual installed colors.

**Magnolia Power Project
Silencer Inspection Platform**

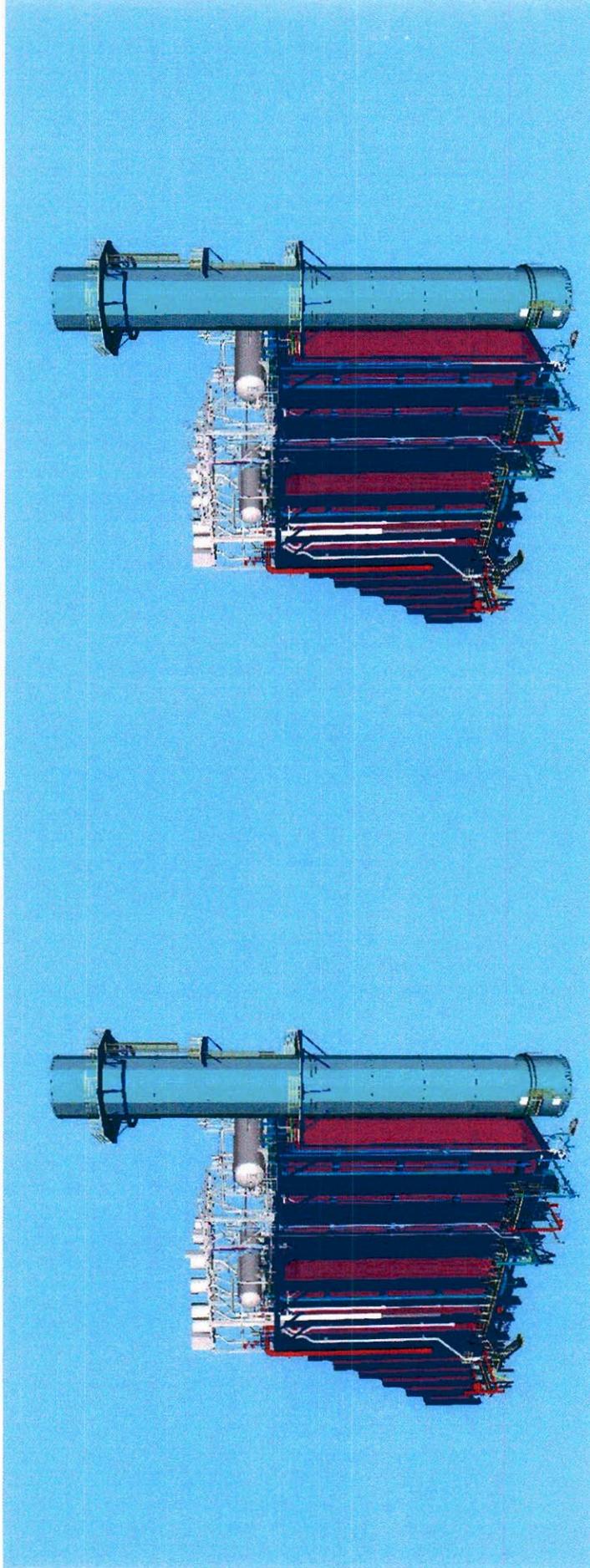
Perspective View from Magnolia Bridge



❖ NOTE - Model HRSG colors do not resemble actual installed colors.

**Magnolia Power Project
Silencer Inspection Platform**

Perspective View from Olive Bridge



BEFORE PLATFORM

AFTER PLATFORM

❖ NOTE - Model HRSG colors do not resemble actual installed colors.