Type-B Accident Investigation Report of the January 20, 1998, Electrical Accident at Casa Grande Substation, South of Phoenix, Arizona



Type-B Accident Investigation Report of the January 20, 1998, Electrical Accident at Casa Grande Substation, South of Phoenix, Arizona

> Western Area Power Administration U.S. Department of Energy

This report is an independent product of the Type-B Accident Investigation Board appointed by Michael S.Cowan, Chief Program Officer, Western Area Power Administration.

The Board was appointed to perform an investigation of this accident and to prepare a report in accordance with DOE Order 225.1A, *Accident Investigations*.

The discussion of facts, as determined by the Board, and the views expressed in this report do not assume and are not intended to establish the existence of any duty at law on the part of the U.S. Government, its employees or agents, contractors, their employees or agents, or subcontractors at any tier, or any other party.

This report neither determines nor implies liability.

FEB 1 2 1998

On January 20, 1998, I established a Type-B Accident Investigation Board to investigate the January 20, 1998, electrical accident at Casa Grande Substation south of Phoenix, Arizona. The Board's responsibilities have been completed with respect to this investigation. The analysis, identification of contributing and root causes, and judgments of need reached during the investigation were performed in accordance with DOE Order 225.1A, Accident Investigations.

I accept the findings of the Board and authorize the release of this report for general distribution.

Flower

Michael S. Cowan, Chief Program Officer

# **Table of Contents**

Table	e of Cont	tents	i
Exhi	oits, Figu	ares and Tables	ii
Acro	nyms an	d Initialisms	iii
Exec	utive Su	mmary	iv
1.0	Introd	uction	1
	1.1	Background	1
	1.2	Accident Site Description	1
	1.3	Scope, Conduct, and Methodology	1
2.0 I	Facts and	l Analysis	3
	2.1 A	ccident Description and Chronology	3
		2.1.1 Accident Description	3
		2.1.2 Chronology of Events	9
		2.1.3 Emergency Response and Investigative Readiness	10
	2.2 H	azards, Controls and Management Systems	10
		2.2.1 Construction Safety	10
		2.2.2 Personnel Qualifications and Experience	11
		2.2.3 Western's Policies and Procedures	12
		2.2.4 Human Factors and Training	12
		2.5 Management Systems	13
	2.3 B	arrier Analysis	14
	2.4 Ca	ausal Factors	15
3.0	Conclusi	ons and Judgments of Need	18
4.0 E	oard Sig	gnatures	19
5.0 E	oard Me	embers, Advisors and Staff	20
Appe	endix A -	– Appointment Memorandum	21
Appe	endix B -	- Switching Diagram and 12.47-kV Area Plan View	22
Appe	endix C -	-Clearance, Switching Program, and Special Work Permit	23

# **Exhibits, Figures and Tables**

- Figure 1 Chronology of Events Chart
- Exhibit A Views of Work Site and Equipment
- Exhibit B View of Burn Marks on 12.47-kV Transfer Bus
- Exhibit C View of Prefabricating Isolating Barriers
- Exhibit D View of Burn Mark on 12.47-kV Steel Structure
- Exhibit E View of Burn Mark on Bottom of Steel Beam
- Exhibit F View of Burn Mark on Center Phase Transfer Bus Bolts
- Exhibit G View of Burn Mark on Victim's Lanyard
- Exhibit H View of Burn Marks on Victim's Right Boot
- Exhibit I View of Burn Marks on Victim's Pants
- Table 2.1Performance of Barriers
- Table 2.2Causal Factors Analysis
- Table 3.1Conclusions and Judgments of Need

# **Acronyms and Initialisms**

APS

Arizona Public Service Company Contracting Officer CO COR Contracting Officer's Representative Chief Program Office(r) CPO CSO Corporate Services Office DOE Department of Energy DSWR Desert Southwest Region EMT Emergency Medical Technician HLO Hot Line Order JHA Job Hazard Analysis OSHA Occupational Safety and Health Administration PSOM Power System Operations Manual PSSM Power System Safety Manual RMR Rocky Mountain Region UGPR U Upper Great Plains Region

# **Executive Summary**

### Introduction

On January 20, 1998, at 10:07 a.m (MST), an Apprentice Lineman employed by High Power, Inc., a Western contractor, was seriously injured when he contacted an energized 12.47 kilovolt (kV) bus at the Casa Grande Substation, south of Phoenix. The Victim was transported by air ambulance to the Maricopa Medical Center in Phoenix, AZ.

On January 20, Michael S. Cowan, Western's Chief Program Officer (CPO), appointed a Type-B Accident Review Board (Appendix A), to investigate the accident in accordance with Department of Energy (DOE) Order 225.1A, *Accident Investigations*.

The Board began its investigation on January 21, 1998, and submitted its findings to the appointing official on February 12, 1998.

### **Accident Description**

The accident occurred at the Casa Grande Substation, which is located on the west edge of the town of Casa Grande. The weather was clear and dry and the work site was uncluttered.

Prior to the accident, Western's maintenance personnel had removed most of the 115-kV feed as well as the 12.47-kV feed to the 12.47-kV main bus, and built a temporary shoo-fly to feed the 12.47-kV main bus loads. This work facilitated access to the bus structure from the south to allow installation of isolation barriers and other construction work. The isolation barriers, which were a requirement in the specifications, were to be fabricated from plywood and attached to the south side and west end of the 12.47-kV bus structure. The intent of the barriers was to prevent equipment from coming in contact with the 12.47-kV main bus. Western employees determined at an onsite meeting that pieces of rigid-bus protruding towards the south would be in the way of the barriers. A decision was made to remove these while the main bus was under clearance for installation of the barriers.

The morning of the accident a clearance was obtained on the 12.47-kV main bus. The Electrical District loads were served from a 12.47-kV tie from APS back through the 12.47-kV transfer bus. No Hot Line Order was requested. The points of protection of this clearance were explained to the Contractor Superintendent when the Special Work Permit was issued.

Following completion of a verbal job hazard analysis, an Apprentice Lineman (Victim) was assigned to assist with removal of three rigid-bus stub jumpers from the main bus. He used a ladder to access the top of the steel structure. He then positioned himself directly above the transfer bus in an area that was outside the safe work area of the Clearance. His right foot contacted the energized transfer bus. The APS tieline, which was feeding the loads on the transfer bus, tripped out upon the initial contact. The line reclosed approximately 5 seconds later. The Victim, suspended in his body harness and in contact with the transfer bus, experienced a second electric shock. The line tripped-out the second time, the recloser locked-out, and the line remained deenergized. The Victim pulled himself clear of the bus and was safely lowered to the ground by the Contractor crew.

Western employees telephoned 911 to request emergency assistance. The victim was quickly transported to Maricopa County Hospital in Phoenix.

### **Root and Contributing Causes**

The Board determined that the root cause of the accident was that the Victim moved outside the safe work area as defined by the Clearance and Special Work Permit issued by Western. The Board also identified eight contributing causes that could have eliminated or lessened the severity of the accident, if they had been adequately addressed.

### Conclusions

Western has adequate policies and procedures in place to avert accidents of this type. The training provided is sufficient to allow implementation of these policies and procedures. However, the procedures associated with the Special Work Permits, JHAs, and HLOs were not rigorously followed.

The Contractor's plan for working near energized equipment was not finalized in writing. It overlooked the need to work at the minimum safe working distance to install the barriers and remove the bus pieces. The appropriate request for a HLO was not made by the Contractor. The Contractor's employees were aware of the clearance limits, placed personal protective grounds on the main bus, yet treated the transfer bus as deenergized and grounded.

The Board developed five judgments of need from the conclusions and causal factors. These are as follows:

•Western needs to ensure that all parties rigorously follow the Special Work Permit and JHA procedures.

•Management needs to ensure that procedures for specific sequences of work adjacent to energized equipment are submitted by the contractor and reviewed by Western.

•Management needs to ensure that the contractor's plan identifies work near energized equipment and includes appropriate requests for HLOs.

•Management needs to continually communicate to all involved employees the need to treat ungrounded equipment as energized. This should be a topic of discussion at all management/contractor safety related meetings.

•Management needs to ensure that all Western and Contractor employees understand that they are responsible for their own safety.

Type-B Accident Investigation Report of the January 20, 1998, Electrical Accident at the Casa Grande Substation, South of Phoenix, Arizona.

# **1.0 Introduction**

### 1.1 Background

On January 20, 1998, at 10:07 a.m (MST), an apprentice lineman employed by High Power, Inc., a Western contractor, was seriously injured when he contacted an energized 12.47 kilovolt (kV) bus at the Casa Grande Substation, south of Phoenix. He suffered burns to his left arm, chest, right thigh, and right foot. The Victim was treated at the scene by emergency medical technicians and transported by air ambulance to the Maricopa Medical Center in Phoenix, AZ.

On January 20, Michael S. Cowan, Western's Chief Program Officer (CPO), appointed a Type-B Accident Review Board (Appendix A), to investigate the accident in accordance with Department of Energy (DOE) Order 225.1A, *Accident Investigations*.

The Board began its investigation on January 21, 1998, and submitted its findings to the appointing official on February 12, 1998.

### **1.2** Accident Site Description

The Casa Grande Substation is located on the west edge of the town of Casa Grande, approximately 55 miles southeast of the Desert Southwest Regional (DSWR) Office in Phoenix. The site is located approximately 1/2 mile north of State Highway 84 on Thornton Road. The weather at the time of the accident was clear and dry.

The work site on the day of the accident was uncluttered. Prior to the accident, Western's maintenance personnel had removed most of the 115-kV feed as well as the 12.47-kV feed to the 12.47-kV main bus, and built a temporary shoo-fly to feed the 12.47-kV main bus loads. This work facilitated access to the bus structure from the south to allow installation of isolation barriers and other construction work.

### 1.3 Scope, Conduct, and Methodology

The purpose of the investigation was to determine the causes of the accident, including deficiencies, if any, in Western's construction and contractor management systems, and to help Western promote safety and reduce the potential for similar accidents.

The Board evaluated the Western Construction Office priorities, contractor/government relations and interactions, safety precautions, operational controls and management controls in place at the time of the accident. Interviews were conducted with witnesses and other appropriate Contractor and Federal personnel. The Board conducted an extensive review of Western's switching documents, substation and dispatch logs, dispatcher voice recordings, Construction Specifications, substation drawings, and both Western's and Contractor's safety practices and training records.

The Board used the following accident investigation methods:

- •Site visits and interviews
- •Events and Causal Factors Analysis
- •Barrier Analysis

# 2.0 Facts and Analysis

### 2.1 Accident Description and Chronology

#### 2.1.1 Accident Description

The morning of the accident, following completion of a verbal job hazard analysis (JHA), the Apprentice Lineman (Victim) was assigned to assist with removal of three sections of rigid-bus stub jumpers from the main bus. He used a ladder to access the top of the steel structure. He then positioned himself directly above the transfer bus in an area that was outside the safe work area of the Clearance (Appendixes B and C). At this point his right foot contacted the energized transfer bus. The APS tieline, which was feeding the loads on the transfer bus, tripped out upon the initial contact. The line reclosed approximately 5 seconds later. The Victim, suspended in his body harness and contacting the transfer bus, experienced a second electric shock. The line tripped-out the second time, the recloser locked-out, and the line remained deenergized. The Victim pulled himself clear of the bus and was safely lowered to the ground by the contractor crew (See Exhibits A-I).

#### 2.1.2Chronology of Events

See Figure 1 for a summary of significant events

## EXHIBIT A



#### **NORTH VIEW**

The grounding transformer KZ3A and jumpers scheduled to be removed to place an isolation barrier on the westend. The picture also shows Disc. SW. 1421 open, locked and tagged BAY Z1 NORTH VIEW Showing the location where work was to be performed, which included removal of three pieces of stub bus

#### **NORTH VIEW**

Temporary feed located east of the 12.47-kV bus structure. The picture also shows the location of personal protective grounds on the east side of the main bus.

## EXHIBIT B



Electrical burn mark on south phase of 12.47-kV transfer bus

## EXHIBIT C



View of the prefabricated isolating barriers to be placed along the south and west sides of the 12.47-kV bus structure

## EXHIBIT D



View showing a burn mark on the bottom of the bolt head located on the 12.47-kV steel structure





View of a burn mark located on the bottom section of the steel beam

## EXHIBIT F



View of burn marks on the bolts located on the center phase transfer bus

## EXHIBIT G



View of electrical burn mark located on the victim's lanyard

## EXHIBIT H



View of the victim's right boot showing the electrical burns

## EXHIBIT I



View showing burn marks on the victim's pants



**Chronology of Events** 

9

#### 2.1.3 Emergency Response and Investigative Readiness

Following the accident, when the crew was sure that the Victim was clear of the transfer bus, they safely lowered the Victim to the ground. The crew began first aid procedures by keeping the Victim calm, warm and comfortable until the EMTs arrived. Western employees immediately called 911 for medical assistance. Western's Dispatch Office and other appropriate personnel were promptly notified of the accident. Western and Contractor personnel showed immediate concern for the welfare of the Victim and their own safety and acted in an effective and timely manner in response to the accident.

DSWR Safety Office and Western's Construction Office personnel reviewed and secured the accident site, obtained site photographs, and collected information relative to the accident, which was presented to the Investigation Board.

The Board found that the Contractor had correctly developed and submitted provisions for first-aid and medical care, as required by construction specifications. Emergency notifications were issued in a timely manner in accordance with applicable DOE and Western Orders.

### 2.2 Hazards, Controls and Management Systems

#### 2.2.1 Construction Safety

#### **Construction Specifications**

Western's construction specifications provide for management controls to prevent accidents. Key provisions relative to this accident are requirements for:

•Contractor submittal of a safety program prior to beginning work, including a requirement for a written plan for any proposed work adjacent to energized equipment to ensure adequate activity hazard analysis and provide for protective measures

•Joint Western and Contractor safety meetings, including a pre-construction safety meeting, management safety awareness meetings, and periodic joint safety meetings

•Contractor's submittal of the Superintendent's resume and qualifications proving at least 3 years experience as a superintendent or foreman and demonstrated knowledge of OSHA standards

•Maintaining the minimum electrical clearance distance of 10 feet for voltages of 50 kV or below, as stated in OSHA 1926.550, unless provided written approval by the COR to use the less stringent electrical clearance distance established in OSHA 1926.950.

•Contractor request of clearances, hot line orders and issuance of special work permits by Western to the contractor

•Training and knowledge of all contractor employees

#### Pre-construction Meeting

Western routinely holds a pre-construction meeting with both Western and contractor personnel prior to beginning work under a construction contract. The pre-construction meeting associated with the Casa Grande Substation, Stage 02, Contract DE-AC65-97WG30340 was scheduled with High Power, Inc., by letter dated December 22, 1997. A copy of the meeting agenda was enclosed. This meeting was scheduled for 2 p.m. on January 8, 1998, at Western's DSWR office in Phoenix.

Pre-construction meetings are typically administrative in nature and the agenda for this meeting followed this format. Specific safety topics were included.

The meeting was held as scheduled and attended by the owner of High Power, Inc., the Contractor Superintendent, and 10 Western employees. The meeting generally followed the agenda and specifically referenced the necessity of a pre-construction safety meeting and weekly toolbox meetings. The Contractor Superintendent's responsibility for carrying out the Contractor's safety and health program was addressed.

#### Pre-Job Safety Meeting

Western routinely holds a pre-job safety meeting with both Western and contractor personnel prior to beginning work. The meeting for this contract was held onsite at the Casa Grande Substation January 14, 1998. The minutes of this meeting indicate attendance by the Contractor Superintendent from High Power, Inc., Western's Construction Manager (Acting Field Engineer), Western's Construction Representative (Inspector) and a Western Safety Specialist.

This meeting, according to the minutes, was comprehensive and included some issues pertinent to the specific job. Placement of plywood barricades (Exhibit C) on portions of the south and west sides of the bus structure was discussed. Discussion items included working in close proximity to energized facilities, the need for a JHA, maintaining safe working distances, hot line orders (HLOs), and proper grounding procedures, including documentation of locations of grounds on the Special Work Permit (Appendix C).

#### 2.2.2 Personnel Qualifications and Experience

#### Construction Representative

The Construction Representative assigned to Casa Grande Stage 02 at the time of the accident has over 30 years of job experience and has been a Western employee since 1979. During that period he worked with contractors in several regions of Western and has become known as one of the most knowledgeable inspectors. He was described by one individual as the inspector with the "most experience" in Western. This level of respect and trust was confirmed in the interviews conducted by the Board. The Construction Representative received two significant Western awards in 1997 for his work in substation construction.

The Construction Representative worked with High Power, Inc. on at least five separate jobs and with the High Power Construction Superintendent assigned to Casa Grande Stage 02 on several of those jobs. This was considered a plus by Western's Construction Office personnel since communications between the two were considered to be open and frank. The Construction Representative had significant and recent experience as a switchman. He held a current Switchman Certificate from DSWR dated 11-18-97, and was certified to switch in the UGPR in 1997.

#### Contractor's Superintendent

The Contractor's Superintendent has 15 years experience in the high-voltage construction industry, including 10 years with High Power, Inc.

He met the Specification experience requirements of 3 years as a superintendent or foreman in highvoltage substation construction. He also had the requisite OSHA knowledge and had a properly-submitted resume.

Western employees from the three construction offices are familiar with the Construction Superintendent and his work. In interviews they spoke highly of his abilities, experience, and his supportive attitude toward both the Contractor's and Western's Safety Programs.

#### Western's Employees

Western's employees involved in the work on Casa Grande Stage 02 included construction managers, engineers, craftsmen, and dispatchers. Without exception, these employees had adequate experience and training to perform the work involved.

#### Contractor's Employees

The Contractor's workforce, other than the Contractor Superintendent, consisted of two journeyman linemen and two apprentices. The journeymen had many years of high-voltage construction experience. The Victim graduated from a lineman training program and had prior experience with a South Dakota electrical cooperative. These employees were trained in first-aid and CPR.

#### 2.2.3 Western's Policies and Procedures

#### Western's Accident Investigation Program

Western investigates accidents and near-miss incidents to determine root causes and prepare judgments of need. The judgments of need, which are widely circulated, are intended to prevent future occurrences of similar incidents.

#### Western's Power System Operations Manual, Chapter 1, "Power System Switching Procedure"

This document establishes coordinated and consistent switching procedures for the safe and reliable operation and maintenance of those facilities of the Federal power system for which Western is responsible. These procedures include clearances, hot line orders, special conditions, danger tags, general switching, and special work permits.

#### 2.2.4 Human Factors and Training

The Board met with personnel involved with the Casa Grande Construction Project and found no evidence of animosity or ill-feeling among themselves or towards Western or High Power, Inc. In fact, the overall attitude of those involved was positive and supportive of Western's and High Power, Inc's construction activities and safety programs. The cooperation and working relationship between Contractor and Western personnel were found to be satisfactory and positive. All individuals stated that they were not pressured to complete the work in any way other than in a safe manner. The Board found no evidence of physical or mental impairment among the Contractor or Western personnel.

A review of training records showed that contractor crew members and Western personnel had more than adequate training and experience to perform the work safely.

The Board found that weather conditions at the time of the accident were not adverse and had no affect on the accident.

#### 2.2.5 Management Systems

#### Western's Occupational Safety and Security Program

This program outlines most aspects of planning and directing the safety program for all activities including the construction, operation, and maintenance of high-voltage transmission lines, substations, and related facilities in a large geographical area. The safety program includes a wide variety of functions directed at eliminating undesirable operating conditions and minimizing hazards.

Construction is generally performed by contract employees, while operation and maintenance is performed by Western employees.

The Program allows for comments and input in the development of safety policies and provides guidelines to field managers and supervisors in the formulation of local safety policy. It provides general safety oversight and direction at all operational levels in the field offices for development of operational and work procedures.

Specific provisions of the safety guidelines:

•Allow review of designs and specifications for new facilities to ensure compliance with existing safety standards

•Allow review of construction contractor safety programs and work procedures to ensure compliance with specifications and safety requirements

•Require participation of a safety adviser in meetings between contractor and Western managers

•Promote working with managers and administrative staff to evaluate employee skills and safety training needs

•Promote participation of operation and maintenance staff in supervisory safety meetings

•Provide technical guidelines to assist supervisor and managers in development of specialized safety training

•Require coordination and oversight of complete safety audit system

- •Provides technical guidance to committees and meetings
- •Requires investigation of accidents resulting in personal injury or property damage

•Requires development and implementation of safety awareness programs

#### 2.3 Barrier Analysis

A barrier is defined as anything that is used to control, prevent, or impede a process and is intended to protect a person or object from hazards. The Board conducted a barrier analysis that identified safety, administrative, and management barriers that failed. Successful performance of any of these barriers would have prevented or mitigated the severity of the accident. The barriers that failed are listed in Table 2.1

Barriers	Purpose	Performance	
Job Preplanning	To determine the scope of work and to inform involved personnel of that scope.	Barrier failed because the planning was inadequate and not all of the involved per- sonnel understood all parts of the scope of work.	
Contractor Safety Program	To comply with Federal reg- ulations and establish con- tractor safe working proce- dures and policies.	Barrier failed because the Contractor Victim did not follow the safe working poli- cies and procedures estab- lished in the Safety Program.	
Power System Operations Manual (PSOM), Chapter 1 Switching Procedure	To establish coordinated and consistent switching proce- dures for the safe and reli- able operation and mainte- nance of those facilities of the Federal Power System for which the Western Area Power Administration is responsible.	The barrier failed because the personnel involved failed to ensure that the clearance limits stated on the Special Work Permit were adequate for the work performed. Personnel also failed to rec- ognize the need for a HLO.	
Western's specifications paragraph on electrical clear- ance distances, 1.5.9	Requires written authoriza- tion from the COR for con- tractor forces to work at the less stringent electrical clear- ance distances established by OSHA.	The personnel involved failed to recognize the need to request this written approval from the COR.	

**Table 2.1 Performance of Barriers** 

Job Hazard Analysis	To identify all potential haz- ards and develop work pro- cedures to mitigate those hazards.	The barrier failed because it did not adequately identify the potential hazards.
Training	To ensure Western and con- tractor employees are well versed in safe work proce- dures and policies.	The barrier failed because employees did not recognize the inadequacy of the defined safe working area.
Experience	To utilize the experience of Western and Contractor per- sonnel to perform specified tasks safely and efficiently	The barrier failed because both Western and Contractor personnel exhibited so much trust in each other's experi- ence that simple but vital assertions were not ques- tioned.

### 2.4 Causal Factors

The root cause of the accident was that the Victim moved outside the safe work area as defined by the Clearance and Special Work Permit issued by Western (Appendix C).

The Board also identified numerous contributing causes. Contributing causes are defined as those issues that increase the likelihood or the severity of the accident without individually causing the accident. Contributing causes are important enough to be recognized as requiring corrective action. The causal factors are identified in Table 2.2.

Root Cause	Discussion
Victim Leaving Safe Work Area	The Victim moved from an area that was protected by the Clearance and personal protective grounds to an area that was not protected in any way. This area (transfer bus) was in fact energized, which was not recognized by any of the workers or the Construction Representative. Even so, the Victim and the other linemen were aware that no grounds had been paced on the transfer bus. The owner of the construction company had a slogan, "If it isn't grounded, it isn't dead." This appeared on all trucks as bumper stickers and was continuously rein- forced in meetings. This basic principle was ignored by the Victim.
Contributing Causes	Discussion
Western's Construction Representative stated that the 12.47 kV transfer bus was deen- ergized.	The Board found no definitive reason as to why the Construction Representative would believe the transfer bus was deenergized. The Clearance was clearly for the main bus only. He participated in meet- ings with the Outage Coordinator where a discussion was held about feeding the load through the transfer bus. Western's Construction Specifications for Casa Grande Stage 02 clearly state that concurrent outages of both buses are not possible.
Contractor's Superintendent report- ed to the linemen that the entire structure was deenergized	The Contractor's Superintendent accepted without question the Construction Representative's statement that the transfer bus was deenergized. He repeated this multiple times to his crew. He signed the Special Work Permit, which clearly stated the points of protection for the main bus and "walked those points" with the Construction Representative. He, by virtue of his position, knew or should have known, of the specification requirement that limits bus outages to one bus at a time. This knowledge should have corrected the erroneous idea that the bus was deenergized.
Verbal JHA	The Contractor's verbal JHA provided discussion regarding points of protection for the main bus and placement of personal protective grounds. However, the participants did not identify the hazards associated with ungrounded equipment that included, but was not limited to, the grounding transformer KZ3A and the 12.47 kV transfer bus, nor did the JHA provide for protective measures to mitigate the hazards.
Inadequate Review of the Special Work Permit	Involved personnel did not review the Special Work Permit to ensure that the Clearance limits were adequate for the work planned. The Special Work Permit procedures had become a routine mechanical function.

### Table 2.2 Causal Factors Analysis

Inadequate planning	Pre-job planning, activity hazard analysis, and protective measures were inadequate because the Contractor did not develop a written plan and submit it to Western for review and comment. The plan to remove the rigid-bus stub jumpers from the main bus was inadequate. The Contractor did not obtain written approval from the COR to work at the less stringent electrical clearance distances established by OSHA 1926.950. Western's Specifications require the Contractor to maintain a minimum approach distance of 10 feet for voltages of 50 kV and below.
Lack of a Hot Line Order	<ul> <li>Involved personnel, both Western's and the Contractor's, failed to recognize that a HLO would not have directly prevented the accident, but would have reduced the severity. A HLO would, possibly, have alerted the workmen to the fact that the bus was energized.</li> <li>Western's Construction Specifications and the PSOM, Chapter 1, are clear and specific on the procedures for obtaining a HLO.</li> <li>One Western employee stated that HLOs are not usually obtained on buses. In this case the bus was fed by a 12.47 kV line protected by a circuit breaker that was controlled by a single-shot recloser. A HLO could have been obtained.</li> </ul>
Workers did not take responsibility for their own safety	The Contractor's workers did not take total responsibility for their own safety. Instead they relied on verbal assurances, based on mutual trust, that devices were deenergized. They did not critically review the points of protection listed in the Special Work Permit, nor did they review the placement of personal protective grounds based on their understanding that the transfer bus and the grounding transformer KZ3A were deenergized.
Trust between Contractor's Superintendent and Western's Construction Representative result- ed in a non-question- ing attitude.	Western's Construction Representative and the Contractor's Superintendent developed significant trust and respect for each other, often working together on various construction jobs. This relationship resulted in a non-questioning attitude between both individuals. For example, when Western's Construction Representative told the Contractor's Superintendent that the whole bus structure was deener- gized, he accepted this without question rather than verifying its con- dition.

# **3.0 Conclusions and Judgments of Need**

Conclusions are a synopsis of facts and analytical results that the Board considers especially significant. Judgments of need are management controls and safety measures believed necessary to prevent or mitigate the probability of recurrence. They flow from the conclusions and causal factors and are directed at guiding managers in developing followup actions.

Conclusions	Judgments of Need
The Special Work Permit and the JHA proce- dures failed to prevent the accident because they were not properly executed.	Western needs to ensure that all parties rigor- ously follow the Special Work Permit and JHA procedures.
The Contractor's safety program did not include written procedures for working near energized equipment. As a result of onsite impromptu planning, Western and the con- tractor failed to recognize that the minimum electrical safe working distance required by Western Specifications would have to be vio- lated in order to perform the work.	Management needs to ensure that procedures for specific sequences of work adjacent to energized equipment are submitted by the contractor and reviewed by Western.
Western's Specifications and PSOM, Chapter 1, require a HLO when working on or near energized equipment. The planned work was near energized equipment, however, the need for a HLO was not recognized.	Management needs to ensure that the con- tractor's plan identifies work near energized equipment and includes appropriate requests for HLOs.
The Contractor employees and Western's Construction Representative erroneously believed that the entire 12.47-kV bus struc- ture was deenergized. They treated the whole structure as if it were grounded, when in reality, only the main bus was grounded.	Management needs to continually communi- cate to all involved employees the need to treat ungrounded equipment as energized. This should be a topic of discussion at all management/contractor safety related meet- ings.
The workmen did not take responsibility for their own safety. They relied on others to ensure that the entire 12.47-kV bus structure was a safe work area.	Management needs to ensure that all Western and Contractor employees understand that they are responsible for their own safety.

#### Table 3.1 Conclusions and Judgments of Need

# 4.0 Board Signatures

Gerald C. Wegner

Accident Investigation Board Chairperson Western Area Power Administration Billings, Montana

1 Drack Patrick M. Doak

Accident Investigation Board Member Western Area Power Administration Huron, South Dakota

Troy E. Henry

Accident Investigation Board Member Western Area Power Administration Loveland, Colorado

Lazaro (Larry) M Komero Accident Investigation Board Member Western Area Power Administration Golden, Colorado

Douglas N. Harness

Douglas' N. Harness Legal Advisor Western Area Power Administration Golden, Colorado

Date: 2-12-98

Date: 2/12/98

Date: 2/12/98

Date:

Date: 2/12/98

# **5.0 Board Members, Advisors and Staff**

Chairperson	Gerald C. Wegner, Western, UGPR
Member	Patrick M. Doak, Western, UGPR
Member	Troy E. Henry, Western, RMR
Member	Lazaro ( Larry ) M. Romero, Western CSO
Member/Legal Advisor	Douglas N. Harness, Western CSO
Technical Writer	Gerry Himes, Remtech Services, Inc., Western CSO

# **APPENDIX A**

## Appointment of Type-B Accident Investigation Board

United States Government

# memorandum

#### Western Area Power Administration

DATE: JAN 2 1 1903

### ATTN OF: A3000

- NULLECT: Accident Review Board--Casa Grande Substation Accident, January 20, 1998
  - D. Vernon, Office of Security Evaluation, EH-21
     G. Wegner, B0000, Billings, MT
     J. Bladow, J0000, Loveland, CO

Reference A3000 memorandum of January 20, 1998, same subject, this memorandum amends the Accident Investigation Board by replacing Craig R. Oliver with Larry Romero. The Board members are as follows:

Gerald C. Wegner - Regional Manager Billings, Montana; Chairman

Patrick M. Doak - Field Engineer Huron, South Dakota

Troy Henry - Safety Specialist Loveland, Colorado

Larry Romero - Electrical Engineer Golden, Colorado

Douglas N. Harness - Legal Advisor Golden, Colorado

MA Stower

Michael S. Cowan Chief Program Officer

cc: M. Hacskaylo, Acting A0000 L. Juarez, Acting A0200 D. Harness, A0203 J. Dodd, Acting A0500 V. Ponce, A1000, (w/copy of Jan 20 memorandum) L. Roux, A1300, (w/copy of Jan 20 memorandum) L. Romero, A1300, (w/copy of Jan 20 memorandum) J. Slawson, A3000 J. Harris, A3200.HU P. Doak, A3220.HU T. Dembrowski, A3700 D. Olson, B5300.HU C. Olivier, B5314.HU T. Carlson, G0000, Phoenix, AZ M. Lowell, G8000, Phoenix, AZ B. Marsh, J0700, Loveland, CO T. Henry, J0710, Loveland, CO United States Government

# memorandum

Western Area Power Administration

DATE: JAN 3.3 III

ATTN OF: A3000

SUBJECT: Accident Review Board--Casa Grande Substation Accident, January 20, 1998

To: D. Vernon, Office of Security Evaluations, EH-21 G. Wegner, B0000, Billings, MT

J. Bladow, J0000, Loveland, CO

This memorandum establishes an Accident Investigation Board to investigate the subject accident. The following Western employees will serve as Chairperson and members until the review is closed.

Gerald C. Wegner - Regional Manager Billings, Montana; Chairman

Patrick M. Doak - Field Engineer Huron, South Dakota

Troy Henry - Safety Specialist Loveland, Colorado

Craig R. Olivier - Electrician Huron, South Dakota

Douglas N. Harness - Legal Advisor Golden, Colorado

The scope of the board's investigation will include, but is not limited to identifying all relevant facts; analyzing those facts to determine the direct, contributing, and root causes of the accident; developing conclusions; and determining the judgments of need that, when implemented, should prevent the recurrence of the accident. The investigation will specifically address the role of management systems as they may have contributed to the accident and the application of lessons learned from similar accidents within Western.

The team members may charge their time and expenses to work order number: CAG---- 0006C 00 30016.

The report shall be forwarded by memorandum which states the Board's recommendations, to me within 30 calendar days of this correspondence.

Please keep the Office of Safety and Security advised of your progress and solicit their assistance or the technical assistance of any others that you may need.

Frun

Michael S. Cowan Chief Program Officer

# **APPENDIX B**

- Casa Grande Substation 12.47-kV Bus Structure Drawing (Showing location of workers at time of the accident)
- Casa Grande Substation Temporary Swtiching Diagram (Showing perimeter of safe working area)





# **APPENDIX C**

- Clearance Procedure and Switching Program
- Special Work Permit

/13/98 Ø8:35 WAPA DISPATCH → COOL	IDGE SUB		ND.900 P002	/00
SWITCHING	PROCEDURE FORM			
DP REF # 605 P	ART ONE	PROGR	AM NO:	-
QUEST BY:HARTILL FOR:CL	, TI	ME:1300 DAT	z: 1/12/98	
WITCH ST. TIME:0800 DATE: / /		ME:1300 DAT	E: 1/20/98	
NX START TIME: 0900 DATE. 17207	<b>30 and -</b>		• • • •	
MATION: CAG CASA GRAND	de Sta. Ser. (APS	WILL CARRY LOP	D).	
UIPMENTITZ.J-RA MAIN BOJ TO INOBC				
ETWEEN: OPEN, LOCKED & TACGED 115-	W MOI 661, DISCONN	ECT 1023, 112	3, 1223,	
1323, (1421) AND RENOVED SEC	CONDARY POT. FUSES	VZ2A ON 12.5-1	V 805.	
			Va	ch
NO ISSUED TO	BY	TIME:	DATE:	
NO ISSUED TO	BX	TIME:	DATE:	
NO. ISSUED TO	BX	TIME:	DATE:	
	DA	TTME -	DATE:	
NO ISSUED TO	D1	******* <u></u>		
NO RELEASED BY	TÔ	TIME:	DATE:	
NO RELEASED BY	10	TIME:		
NO RELEASED BY	TO	TIME:	DATE:	
NO RELEASED BY	TO	TIME:	DATE:	
	TTO AN 12 5-KU BI	S STR TO ALLOW	CONST.	
F YARD AND JUMPERS FROM DISC. 142	1 TOWARDS BUS WILL	BE REMOVED.		
	s			
	GRIES ORAN			
THERS NOTIFIED: COL- 100123 APS-	ED2- Gill			
	•			
UTHORIZED BY: CWM	TIME: 1352	DATE: 1/12/9	18 18	
	PTMR: 1352	manners all sent -	•	-
PREPARED BY:CWM	TIME: 1352			
CHECKED BY:	TIME:1352 TIME: SERVICE: OK TO PE	DATE:	· ··	
PREPARED BY: CWM CHECKED BY: MITCHING TO REMOVE EQUIPMENT FROM	TIME:1352 TIME: SERVICE: OK TO PF	DATE:	·	
PREPARED BY: CHECKED BY: WITCHING TO REMOVE EQUIPMENT FROM LNE: DATE: DISPATCH	TIME:1352 TIME: SERVICE: OK TO PF	DATE: ROCEED SWITCHMAN	·	-
PREPARED BY: CHECKED BY: WITCHING TO REMOVE EQUIPMENT FROM LNE: DATE: DISPATCH WITCHING TO RETURN EQUIPMENT TO S	TIME:1352 TIME: SERVICE: OK TO PROCESSERVICE: OK TO PROC	DATE: ROCEED SWITCHMAN CEED	·	-
PREPARED BY:         CHECKED BY:         WITCHING TO REMOVE EQUIPMENT FROM         INE:       DATE:         DATE:       DISPATCH         WITCHING TO RETURN EQUIPMENT TO S         INE:       DATE:         DATE:       DISPATCH	TIME:1352 TIME: SERVICE: OK TO PROC BERVICE: OK TO PROC	DATE: ROCEED SWITCHMAN CEED SWITCHMAN	·····	-
PREPARED BY:	TIME:1352 TIME: SERVICE: OR TO PROCESSERVICE: OK TO PROCESSERVICESSERVICE: OK TO PROCESSERVICESSERVICE: OK TO PROCESSERVICE: OK TO PROCESSERVICESSERVICESSERVICE: OK TO PROCESSERVICESSERVICESSERVICESSERVICESSERVICES	DATE: ROCEED SWITCHMAN CEED SWITCHMAN		
PREPARED BY: CHECKED BY: WITCHING TO REMOVE EQUIPMENT FROM INE: DATE: DISPATCH WITCHING TO RETURN EQUIPMENT TO S IME: DATE: DISPATCH OMMENTS:	TIME:1352 TIME: SERVICE: OR TO PROG SERVICE: OK TO PROG	DATE: ROCEED SWITCHMAN CEED SWITCHMAN	•••	
CHECKED BY:	TIME:1352 TIME: SERVICE: OR TO PROCESSERVICE: OK TO PROCESSERVICE:	DATE: ROCEED SWITCHMAN CEED SWITCHMAN		
PREPARED BY:	TIME:1352 TIME: SERVICE: OK TO PROCESSERVICE: OK TO	DATE: ROCEED SWITCHMAN CEED SWITCHMAN		

01/1	13/98	Ø8:35 N	MAPA DISPATCH → COOLIDGE SUB	ND.900	P003/006
SWP2 CAG EQUI	PMENT	:12.5-XV M	PHOENIX AREA OFFICE SWITCHING PROCEDURE FORM PROGRAM AIN BUS TO INCLUDE STA. SER. (APS WILL CARRY L	NO: <u>48-0</u> 65 GAD).	
Ħ	WHO	WHAT	PART TWO - PLACE ACTION EQUIPMENT AND DESCRIPTION	TAG # TIME S	WITCHMAN
1	DSP	NOTIFY	APS, ED2. OF SWITCHING.		DORN
2	CAG	CK BLACE	REG. ON MANUALYAND MATCH DOE KY TO APS TIE KY.		
3	DSP	CLOSE	AT CAG, (AT APS REQUEST) PCB 1122, PARALLELING APS & WESTERN.	084/	
4	CAG	CK CLOSED	PCB 1122 AT PCB.	0843	BOYER
5	CAG	CLOSE	DISCONNECT 1125.	0844	
6	CAG	CK CLOSED	PCB 1022 AT PCB.	0844	
7	CAG	CLOSE	DISCONNECT 1025.	0845	-
8	CAG	CK CLOSED	PCB 1222 AT PCB.	0845	-
9	CAG	CK CLOSED	DISCONNECT 1225.	0845	
10	CAG	CK CLOSED	PCB 1322 AT PCB.	0844	
	CAG	CLOSE	DISCONNECT 1325.	084	7
12	DSP	OPEN	AT CAG, PCB 1322.	<u>D848</u>	DORN
13	DSP	Open	AT CAG, PCB 1222.	0849	
14	DSP	OPEN	AT CAG, PCB 1022.	0849	
15	DSP	open	AT CAG, PCB 1122, (BREAKING PARALLEL). (APS CARRYING ED2 LOAD VIA TRANSFER BUS).	0850	
16	CAG	READ	THE FOLLOWING REVENUE METERS: CG-236; CG-237; CG-212. READ REVENUE METER CG 202 (APS IN).	<u>Ø53</u>	ROETHLE <u>BOYER</u>
17	DSP	OPEN	AT CAG, PCB 422, DE-ENERGIZING STA. SER. AND MAIN 12.5-KV BUS.	<u>0854</u>	DORN
18	DSP	open	AT CAG, MOI 661, DE-ENERGIZING TEMP XFMR BANK.	L/T 0854	
19	CAG	PLACE	43CS SWITCH HOI 661 TO LOCAL.	TAG/5 0857	BOYER
20	CAG	CR OPEN	NOI 661 AT MOI AND DISABLE MOTOR OPERATING MECHANISM.	1/T 7 0901	<u> </u>
21	CNG	CK OPEN	PCB 1322 AT PCB.	0902	-
22	CAG	open	DISCONNECT 1323.	TAG 2 0703 Revised: 12/	10/97

•

. . .

- -----

01/1	.3⁄98	Ø8:35	WAPA DISPATCH > COOLIDGE SUB	ND.922 P224/226
SNPZ CAG EQUI	PMENT :	12.5-KV	PHOENIX AREA OFFICE SWITCHING PROCEDURE FORM MAIN BUS TO INCLUDE STA. SER.	PROGRAM NO: 98 (APS WILL CARRY LOAD).
#	WHO	WHAT	PART TWO - PLACE ACTION EQUIPMENT AND DESCRIPTION	TAG # TIME SWITCHMAN ROETHLE
23	CAG	CK OPEN	PCB 1222 AT PCB.	0904 BOYER
24	CAG	open	DISCONNECT 1223.	TAG/2 0904
25	CAG	CK OPEN	PCB 1122 AT PCB.	0905
26	CAG	OPEN	DISCONNECT 1123.	TAG 11 0906
27	CAG	CK OPEN	PCB 1022 AT PCB.	0906
28	CAG	Open	DISCONNECT 1023.	TAG <u>10 0907</u>
29	CAG	RENOVE	12.5-KV SECONDARY POTENTIAL MAIN BUS "VZ2A".	PUSES TO TAG 9 0909
30	CAG	CK OPEN	GROOND , MANSFORMER DISCONNE (NO LONGER IN USE).	TT 1421. L/E

•	01/13/	⁄98	08:35 W	APA DISPATCH $\rightarrow$ COOLIDGE SUB	NO.900 PU05/006
	SWP3 CAG EQUIPH	ent :	12.5-KV NA	PHOENIX AREA OFFICE SWITCHING PROCEDURE FORN PROGRA IN BUS TO INCLUDE STA. SER. (APS WILL CARRY	NN NO: 18-065 LOAD).
-	M N	0HO	WHAT	PART THREE - REMOVE ACTION EQUIPMENT AND DESCRIPTION	TAG # TIME SWITCHMAN
	1	DSP i	NOTIFY	APS, ED2, OF SWITCHING.	PANTAL ()
	2	CAG	CK RENOVE	JUMPERS FROM DISCONNECT 1421 TOWARDS MAIN BUS. (GRU BANK NO LONGER IN USE).	T/R DOYER
	3	CAG	REPLACE	FUSES "VZ2A" 12.5-KV NAIN BUS SECONDARY POTENTIAL.	T/R <u>9  3/4</u>
	4	CAG	CK CLOSED	STATION SERVICE FUSED DISCONNECT F24A.	13/4
	5	CAG	CK OPEN	PCB 1022 AT PCB.	13/6
	6	CAG	CLOSE	DISCONNECT 1023.	T/R/0 1317
	7	CAG	CK OPEN	PCB 1122 AT PCB.	1318
	8	CAG	CLOSE	DISCONNECT 1123.	T/R 11 1319
	9	CAG	CR OPEN	PCB 1222 AT PCB.	[319
	10	CAG	CLOSE	DISCONNECT 1223.	T/R/2 1320
	11	CAG	CK OPEN	PCB 1322 AT PCB.	1320
	(12	CAG	CLOSE	DISCONNECT 1323.	T/R 2 1321
	13	CAG	CK OPEN	PCB 422 AT PCB.	1321
	14	CAG	CK CLOSED	DISCONNECT 421.	1322
	15	CAG	CK OPEN	MOI 651 AT NOI AND ENABLE MOTOR OPERATING MECHANISM.	T/R 7 1323
	16	CAG	PLACE	43CS SWITCH MOI 661 TO SUPERVISORY POSITION.	T/R/5 1325 1409
	17	DSP	CLOSE	AT CAG, MOI 661, ENERGIZNG TEMP XFMR BANK.	T/R 1359. DORN
	18	CAG	CK CLOSED	NOI 661 AT MOI.	1402 KOSTHER
	19	CAG	CLOSE	PCB 422, ENERGIZING 12.5-KV MAIN BUS $M \neq$ and Sta. Ser.	INUALLY 1418
	20	CAG	Match	XPMR TAP BASED ON MAR 115-KV BUS	mennen
	21	DSP	CLOSE	AT CAG, PCB 1122, PARALLELING WITH APS.	1424 DORN
·	22	DSP	CLOSE	AT CAG, PCB 1022.	1425
i.	23	DŞP	CLOSE	AT CAG, PCB 1222.	1425 Baricad: 12/10/07
ى.	RALC	K	OPER	mol 601 - 1410	NGAT <b>DE</b> T: (7) (A) 21
bene	ť	)PE CL	NED	0150 421 - 1412 1422	

NO.900 P005/006

SWP3 CAG EQUI	PMENT	:12.5-KV M	PHOENIX AREA OFFICE SWITCHING PROCEDURE FORM PROGRAM AIN BUS TO INCLUDE STA. SER. (APS WILL CARRY LO	NO:
#	WHO	WHAT	PART THREE - REMOVE ACTION EQUIPMENT AND DESCRIPTION	TAG # TIME SWITCHMAN
24	DSP	CLOSE	AT CAG, PCB 1322.	1425 DORN
25	CAG	CK CLOSED	PCB 1322 AT PCB.	1436 ROUTHLE
26	CAG	OPEN	DISCONNECT 1325.	1437
27	CAG	CK CLOSED	PCB 1222 AT PCB.	1437
28	CAG	CK CLOSED	DISCONNECT 1225. (LEAVE CLOSED, ENERGIZING TRANSFER BUS).	1 <u>437</u>
29	CAG	CK CLOSED	PCB 1022 AT PCB.	1 <u>438</u>
30	CAG	OPEN	DISCONNECT 1025.	1438
31	CAG	CK CLOSED	PCB 1122 AT PCB.	1438
32	CAG	OPEN	DISCONNECT 1125.	1439
33	DSP	OPEN	AT CAG, PCB 1122, (BREAKING PARALLEL).	1442 DORN
34	CAG	READ	REVENUE METERS CG-236; CG-237; CG-212. & CG 202 (APS IN).	1443 ROEVHLE
35	DSP	NOTIPY	APSED2	

SWITCHING COMPLETED.

WAPA F 6500.12 (--82) UNITED STATES DEPARTMENT OF ENERGY WESTERN AREA POWER ADMINISTRATION

## **SPECIAL WORK PERMIT**

NUMBER <u>C98-06</u>5

	SOLICITATION NO.
A POWER SYSTEM (CLEARANCE) (HOT LINE ORDER) HAS BEEN ISSUE	ED ON THE FOLLOWING FACILITY.
(MARK ONE OUT)	
Case Grande Main Bus to In	chude star Ser.
TO PERMIT WORK BY CONTRACTOR FORCES. THE UNDERSIGNED HAVE DETAILS OF THE ABOVE LISTED PROTECTIVE ACTION FOR ADEQUACY, SAFE WORKING AREA. THE LIMITS OF THE SAFE WORKING AREA ARE	E DISCUSSED THE WORK TO BE DONE, REVIEWED AND DEFINED THE LIMITS AND CONDITIONS OF AS FOLLOWS:
Open locked & tagged 115 KV 1	MOT 661
Open lacked and tread this	Ser. # 1023 # 1123
#1223 #1323 #1421 and Re	missed Secondary
Patential Europe 11291 11 130	Will Bus
for suffer 1-1655 V Conth Br. 12.3	<u>nº Dus</u>
	LEADS ON SPECIAL WORK PE
Issuing Dispatcher:	When work complete, visua
A A	verify all ground leads remov
Releasing Dispatcher: Doran	(including any that slipped
Polosse Time $/2/7$	by the documentation proce
Release Time: 1,907	and the second
	-
NOTE: Draw sketches and/or single line diagrams on reverse side sho	wing safe working limits and hazards if applicabl
IDGLEARANCE NO. 98-065	Sou I Fistball
HOTLINE OPDER DATE 1-20-97 TIME (19/7	(Signature)
The the order Date 2007 Time Correction	AGENCY EMPLOYEE HOLDING ACTION
This Work Permit issued at the worksite Date	Time 0930
	Three Lines
(Signature)	(Signature)
CONTRACTOR'S AUTHORIZED REPRESENTATIVE	AGENCY REPRESENTATIVE IN CHARGE
RELEASE OF SPECIAL WOR	
I HEREBY CERTIFY THAT ALL PROTECTIVE GROUNDS A AND THAT ALL PERSONNEL ARE CLEAR OF THE AREA	ND BARRIERS HAVE BEEN REMOVED
	COVERED DI THIS WORK FERMIT.
CONTRACTOR'S AUTHORIZED, REPRESENTATIVE (SIGNATURE)	DATE TIME
CONTRACTOR'S AUTHORIZED REPRESENTATIVE (SIGNATURE)	DATE TIME $1 - 2/2 - 96$ $12.05$
CONTRACTOR'S AUTHORIZED REPRESENTATIVE (SIGNATURE)	DATE TIME 1-20-98 13:05
CONTRACTOR'S AUTHORIZED REPRESENTATIVE (SIGNATURE)	DATE TIME 1-20-98 13:05 O&M COPY
CONTRACTOR'S AUTHORIZED REPRESENTATIVE (SIGNATURE)	DATE TIME 1-20-98 13:05 O&M COPY CONSTRUCTION COPY
CONTRACTOR'S AUTHORIZED REPRESENTATIVE (SIGNATURE)	DATE TIME 1-20-98 13:05 O&M COPY CONSTRUCTION COPY CONTRACTOR COPY

### DOCUMENTATION OF GROUND LEAD LOCATIONS

************************************	********	**********	*********	********
Location of Grounds	Date/Time Installed	Sup't/WAPA Initials	Date/Time Removed	Sup't/WAPA Initials
		~~~~~~~	~~~~~~~~~~	*******
1				
				-
	-			

•

 A set of the set o and the second second . 73

· . . . . SKETCH LOCATION OF GROUNDS (if needed)

