TALSON
SOLUTIONS LLC

Safety Certification Audit Report
Issued December 8, 2022

Project: **Operations and Maintenance Facility East**

Audit Type: **Security Audit Profiles 1000, 2000 & 3000**
Safety Audit Profile 6000

PREPARED BY (TALSON):

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APPROVED BY (TALSON):

Kenneth Brzozowski – Project Manager	Date:	*November 29, 2022*

APPROVED FOR ISSUE (SOUND TRANSIT):

Patrick Johnson – ST Director, Audit Division	Date:	*December 14, 2022*

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I.   EXECUTIVE SUMMARY

Commencing in August and extending through October 2022, Talson Solutions, LLC (Talson) performed an on-site Safety and Security Certification Audit (SSCA) of Sound Transit's Operations and Maintenance Facility East. The audit was performed on behalf of the Sound Transit Audit Division and focused on the following areas:

Security Audit Profile 1000 –Threat Vulnerability Assessment
- ➤ Assess that threats are identified within preliminary and operating hazard analyses including mitigation actions and efforts
- ➤ Key documents to be reviewed include the Threat Vulnerability Assessment

Security Audit Profile 2000 – Design Conformance Verification
- ➤ Assess that security criteria has been incorporated into the design to support the mitigation of a Certifiable Item / Threat
- ➤ Verify threat inclusions in designs and submittals
- ➤ Key documents to be reviewed include Drawings, Specifications, and Calculations

Security and Safety Audit Profile 3000 – Construction Conformance Verification
- ➤ Verifies that system safety hazard and security threat mitigations are sufficiently constructed according to design and documented properly
- ➤ Key documents to be reviewed include Inspection Daily Reports, Resident Engineer Summary Memos/Photos, Testing Reports, and Commissioning Reports

Security and Safety Audit Profile 6000 – Operations and Maintenance Readiness
- ➤ Assessment of Sound Transit's readiness to assume operational and maintenance responsibility for a capital project
- ➤ Key documents to be reviewed include Rule Book, Standard Operating Procedures and Maintenance Plans, and training records.

Talson found overall that activities being performed generally align with the safety and security certification processes and conform to the Agency's Safety and Security Certification Plan with noted exceptions. Our audit testing resulted in **no findings and seven (7) observations**, <u>six</u> related to Security and <u>one</u> related to Safety. A summary of observation areas include:

1. Limited required reserved security and police parking at the facility (Security AP 3000)
2. Security camera obstructed views (Security AP 1000 & AP 6000)
3. Security camera logistical access (Security AP 1000 & AP 6000)
4. Site facility access (Security AP 6000)
5. Absent security signage (Security AP 1000)
6. In-adequate documentation within the Security Information Management System (SSIMS) database (Security AP 1000 – 3000)
7. Correlation of Certifiable of Items between the Operational Hazard Analysis and SSIMS (Safety AP 1000)

II.   SCOPE AND METHODOLOGY

The audit was conducted to ensure that system hazards are effectively identified from preliminary engineering to revenue services inclusive of certifiable item traceability and mitigation efforts. A Closeout Briefing was facilitated on September 26, 2022 with select project team members, senior Sound Transit management and the Washington State Department of Transportation's Rail Safety Oversight Program Administrators. Continued discussions relating to preliminary findings, observations and potential corrective actions followed the Closeout Briefing.

Notable documentation referenced during the audit included:

 ➢ OMFE Safety and Security Management Plan (PS SSMP), dated July 2018
 ➢ Agency Safety and Security Certification Plan (SSCP), dated February 2018
 ➢ Threat Vulnerability Assessment, not dated
 ➢ Operational Hazard Analysis (OHA), not dated
 ➢ OMFE Safety and Security Verification Report (SSCVR) dated May 2021
 ➢ Safety and Security Information Management System Project Dashboard
 ➢ Various Standard Operating and Maintenance Procedures
 ➢ Drawings, Specifications, and Material Requirements
 ➢ Inspection Daily Reports, Resident Engineer Summaries, Memos/Photos
 ➢ Testing and Commissioning Reports

Talson's audit activities included the following procedures for performance of the audit:

 ➢ Review of certifiable items within SSIMS
 ➢ Prepared SSCA Checklist inclusive of 15% stratified sampling of certifiable items
 ➢ Assessed relevant documentation including SSCP, SSCVR, and PS SSMP
 ➢ Identified verification methods within the SSCA Checklists along with audit results
 ➢ Communicated preliminary findings with Sound Transit
 ➢ Conducted a brief closeout meeting
 ➢ Produce draft and final reporting

Safety and Security certifiable items within various elements listed within Sound Transit's SSIMS database were selected for conformance testing specific to the following Elements: Communications, Fire/Life/Safety, Yard and Shop, Safety/Security Plans Procedures and Training. Talson selected 15% of the 63 closed Security Certifiable Items that were populated in SSIMS for review during this audit. Interviews were conducted with Safety personnel and various standard procedures were compared with OHA requirements.

Audit Profile Descriptions include the following areas of audit focus and testing:

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Audit Profile 1000:

The purpose of the Safety/Security Certification Audit Profile 1000 is to ensure the completeness and integrity of SSIMS certifiable items for predefined hazards located in the Preliminary Hazard Analysis (for Safety) or the Threat Vulnerability Assessment (for Security) including potential causes, effects, and mitigation efforts ensuring that all are listed in SSIMS for resolution.

Audit Profile 2000:

The purpose of the Safety/Security Certification Audit Profile 2000 is to ensure that mitigation efforts related to construction have been incorporated into the appropriate design drawings and specifications. This documentation must be uploaded into SSIMS under each respective certifiable item that was identified in the initial hazard analysis.

Audit Profile 3000:

The purpose of the Safety/Security Certification Audit Profile 3000 is to ensure that mitigation efforts related to construction have been verified and inspected. Aside from physical inspection, desktop verification occurs with inspection reports and photos. This documentation must be uploaded into SSIMS under each respective certifiable item that was identified in the initial hazard analysis.

Audit Profile 6000:

The purpose of the Safety/Security Certification Audit Profile 6000 is to assess the operations and maintenance readiness of the newly constructed building or station. This includes compliance with regulatory guidelines, 3rd party trainings, updates to the Rule Book and procedures, and interfacing between passengers and public.

Verification testing done through assessing data with the SSIMS dashboard utilized the following ratings as part of the audit process and are noted within the audit checklist:

- **Acceptable:** No deviation from the implemented SSCP.
- **Conditionally Acceptable:** Minor deviation of the implemented SSCP process and unlikely to result in a nonconforming product or service.
- **Unacceptable:** A significant breakdown or partial breakdown in processes that resulted in a nonconforming product or service. Corrective action must be documented formally and include a root cause analysis.

Results of Certifiable Items Audit Testing are as Follows:

Security Audit Profile 1000:

Talson concluded that of the 10 security certifiable items sampled, three (3) were deemed *Conditionally Acceptable (30%)* requiring corrective actions.

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OMFE Security Audit Profile 1000 Summary of Preliminary Audit Findings							
Contract	Total CIs	IDs Sampled	Acceptable	Unacceptable	Conditionally Acceptable	Not Applicable	Comments
OMFE	63	10	7	0	3	0	Multiple reference numbers were for the same mitigation or missing from TVA

Security Audit Profile 2000:

Talson concluded that of the 10 safety certifiable items sampled, four (4) were deemed *Conditionally acceptable (40%)* requiring corrective actions.

OMFE Security Audit Profile 2000 Summary of Preliminary Audit Findings							
Contract	Total CIs	IDs Sampled	Acceptable	Unacceptable	Conditionally Acceptable	Not Applicable	Comments
OMFE	63	10*	6	0	4	0	Design Conformance Field missing uploaded document references

Security Audit Profile 3000:

Talson concluded that, of the 10 safety certifiable items sampled, six (6) were deemed *Conditionally acceptable (60%)* requiring corrective actions.

OMFE Security Audit Profile 3000 Summary of Preliminary Audit Findings							
Contract	Total CIs	IDs Sampled	Acceptable	Unacceptable	Conditionally Acceptable	Not Applicable	Comments
OMFE	63	10*	4	0	6	0	Police parking spot not verified, Missing reference for battery power resolution

III.   FINDINGS

The audit resulted in no findings.

IV.   OBSERVATIONS

The audit resulted in the following a total of seven (7) observations (six security related and one safety related):

Observation 1 *(Security)*
Certifiable Item No. 196 requires reserved/signed parking spots for both security and police. Although there was one designated parking spot for security, there were none visually observed or found during the site walk for local police.

Observation 2 *(Security)*

Talson noted that there were simulated designs for security camera points of view uploaded into in the SSIMS, but no actual pictures were uploaded to verify construction conformance and un-obstructed views.

Observation 3 *(Security)*

Talson observed that the facilities manager did not have the logistical access (username and password) to view the security cameras. Without direct access for key individuals on premise, response times for security incidents may be limited.

Observation 4 *(Security)*

Entry through the north gate onto the premises was gained from the security guard[1] for Talson without the request for credentials, access cards or ID verification.

Observation 5 *(Security)*

Talson verified the use of several security related signages including no trespassing, authorized personnel only and CCTV monitoring indications. However, "See Something Say Something" signs were not observed. Notifying all employees that they are an integral part of suspicious activity monitoring would greatly enhance the security environment of the facility.

Observation 6 *(Security)*

Through review of SSIMS, there were a total of 13 Security Certifiable Items that Talson identified as Conditionally Acceptable. Certifiable Item ID Nos. 169, 170 and 201 each indicated that further backup power mitigation was deemed necessary but without reference to the propane backup generator for resolution (Talson verified). All other Conditional Acceptance ratings were due to missing references in SSIMS conformance fields. Detailed notations are included within the attached OMFE Security APs 1000 - 3000 Checklists.

- Audit Profile 1000 - 3 Conditionally Acceptable Notations
- Audit Profile 2000 - 4 Conditionally Acceptable Notations
- Audit Profile 3000 - 6 Conditionally Acceptable Notations

Observation 7 *(Safety)*

Of the 306 Certifiable Items listed in the Operational Hazard Analysis, SSIMS had only 71 safety operational readiness items populated in total. Although Sound Transit is reassessing the use of SSIMS, the most recent Safety and Security Certification Plan (dated 2018), requires each certifiable item to be populated and tracked to resolution through the SSIMS eforms (reference 3.1.2 Step 2, B., 1. and 2.)

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[1] Talson noted during follow-up discussions that the current security consulting company, Securitas, was not going to be offered a contract extension and Sound Transit would be issuing a Request for Proposal for new security services.

V.   CONCLUSIONS / REQUIREMENTS

Talson found that the overall safety and security certification process is conforming to the Agency's Safety and Security Certification Plans appropriately with minor exceptions for suggested enhancements. Safety and Security Certifiable Items were referenced appropriately in SSIMS from the Threat Vulnerability Assessment and the Preliminary Hazard Analysis. Sound Transit comments regarding the noted findings and observations should be provided within thirty (30) days after the submission of the Audit Report to Sound Transit.

VI.   AUDIT RESPONSE FORM (ARF)

This audit report identified no findings and seven (7) observations that requires a response from the appropriate Sound Transit staff.

Observations can be addressed separately, but a management corrective action should be submitted within **30** days of the final distribution of this report and corresponding ARFs. Verification of conforming corrective action and root cause explanation will be reviewed by Talson upon submission of the ARF by Sound Transit.

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DISTRIBUTION:

Safety and Security Audit Dates:	August – October 2022
Organization:	Sound Transit *(Auditee)*
Responsible Party:	Branden Porter, Director, Transportation Safety & Security *(Auditee)*
Talson Auditor(s):	Ken Brzozowski, Norman Jones, and Robert Farrow *(Auditor)*

Report To:
- Branden Porter, Director, Transportation Safety & Security

Distribution List:
- Mary Cummings, DCEO & Chief Administrative Officer
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- Eric Beckman, Deputy Executive Director, DECM
- Heather Wright, Deputy Director, Audit
- Michael Flood, Senior Auditor, Audit
- Molly Hughes, WSDOT SSO
- Andrew Royer, WSDOT SSO

Attachments:
- OMFE Security APs 1000 - 3000 Checklists
- OMFE Safety AP 6000 Checklist
- OMFE SSCA ARFs (2)