



## Safety Certification Audit Report

November 5, 2025

**Projects:** Federal Way Link Extension

**Audit Type:** Safety & Security Audit Profile 3000

**PREPARED BY (TALSON):**

Yvette Suarez – Audit Manager

Date: October 24, 2025

**APPROVED BY (TALSON):**

Kenneth Brzozowski – Project Manager

Date: October 30, 2025

**APPROVED FOR ISSUE (SOUND TRANSIT):**

Patrick Johnson – Sound Transit

Deputy Executive Director – Internal Audit Division

Date: November 5, 2025

## **Safety & Security Certification Audit Report**

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### I. EXECUTIVE SUMMARY

Commencing in September 2025, and extending through October 2025, Talson Solutions, LLC (Tolson) and subcontractor Transportation Resources Associates (TRA) performed a Safety and Security Certification Audit (SSCA) of Sound Transit's Federal Way Link Extension project (FWLE). The audit was performed on behalf of Sound Transit's Internal Audit Division and focused on specific activities related to Audit Profile 3000 (Construction Conformance).

The Audit Team found that the overall safety certification process is in conformance with the project specific Safety and Security Management Plan (SSMP) and the Agency Safety and Security Certification Plan (SSCP). As part of testing Sound Transit's Safety and Security Information Management System (SSIMS) database, Talson noted that Certifiable Items (CIs) were generally referenced adequately to the Preliminary Hazard Analysis (PHA) and traceable to SSIMS. The audit did note one (1) recommendation regarding discrepancies in the uploaded SSIMS documentation. No (0) Findings were identified. Subsequent to the Audit Closeout Briefing, discussions were facilitated with Sound Transit's Senior System Safety and Security Specialist to note potential corrective actions that can be taken by Sound Transit and external contractor staff to remedy the recommendation.

#### **Objectives**

The objective of SSCAs is to verify evidence that construction and operational activities are in conformance with Sound Transit hazard mitigation plans and certification policy. Sound Transit uses certifiable item forms in SSIMs to evidence hazard mitigating documentation in accordance with required specifications and plans. Hazard mitigation and certification standards are detailed within the SSCP, dated August 2018<sup>1</sup> (updated 2023) and the SSMP, dated March 2022. Audit Profile 3000 objectives for this audit focused on the following:

#### **Audit Profile 3000 – Construction Conformance Verification**

- Verified construction hazards are mitigated in accordance with the hazard analyses and the "Safety and Security Requirements" SSIMS fields
- Evaluated evidence that construction conformance mitigation has been achieved, inspected, and documented
- Key documents reviewed included inspection reports, resident engineer summary memos, photos, product data sheets, and other notable information

#### **Results**

Tolson found that construction conformance activities performed by Sound Transit align with safety and security certification processes and plans with the noted exception. The audit resulted in **one (1) recommendation** regarding a discrepancy in the uploaded documentation and referenced elements within the SSIMS Dashboard. There were **no findings** identified for

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<sup>1</sup> The revised SSCP, dated April 2023 does not reference SSIMS but is not applicable to this project's start date

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evidence of non-conformance or adverse testing results that would negatively impact the opening date of revenue service.

The recommendation and other audit results were shared with appropriate Sound Transit personnel prior to the issuance of this report.

## II. SCOPE AND METHODOLOGY

SCCAs provide independent assurance that identified hazards are effectively mitigated and appropriately documented during each phase of a capital project spanning from preliminary engineering to revenue service. The Audit Profiles (APs) of SSCAs are specific to the completed phases of a capital project:

- |   |   |
|---|---|
| ➤ <b>Audit Profile 1000</b> – Hazard Analysis | ➤ <b>Audit Profile 5000</b> – Vehicle Fabrication |
| ➤ <b>Audit Profile 2000</b> – Design          | ➤ <b>Audit Profile 6000</b> – Training/SOPs       |
| ➤ <b>Audit Profile 3000</b> – Construction    | ➤ <b>Audit Profile 7000</b> – Fire/Life Safety    |
| ➤ <b>Audit Profile 4000</b> – System Testing  | Readiness / Certification Reporting               |

SSCP Section 3.1.2, B., 2. (dated 2018), requires the use of CIs within SSIMS for uploading documented evidence that each identified hazard has been mitigated throughout each completed capital project phase. SCCA testing targets stratified sampling for 15% of all completed CIs covering each identified contract and element. Each sampled CI is verified for relevancy, appropriateness, traceability, and proper referencing. A three (3) tiered rating system is used to categorize the results:

- **Acceptable:** No deviation from the implemented SSCP / SSMP standards
- **Conditionally Acceptable:** Minor deviation of the implemented SSCP / SSMP standard and unlikely to result in a nonconforming product or service
- **Unacceptable:** A significant breakdown or partial breakdown in processes that may result or has resulted in a nonconforming product or service.

CIs that are rated “Conditionally Acceptable” may or may not result in the assignment of audit findings, recommendation, and/or corrective action plans based on the criteria listed in Section V of this report and the professional judgement of the auditor.

The charts below detail the summaries of closed CI forms, including population size and sample selection for each contract reviewed as part of this Safety and Security Audit:

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### AP 3000 Safety Summary

Contract	CI Total	Sampling	Percentage
F200-COMM	53	8	15%
F200-FLS	3	1	33%
F200-FLS-S03	28	4	14%
F200-FLS-S05	23	3	13%
F200-FLS-S07	21	3	14%
F200-GW	107	16	15%
F200-OCS	35	5	14%
F200-S03	159	24	15%
F200-S05	128	19	15%
F200-S07	133	20	15%
F200-SIG	84	13	16%
F200-SP03	26	4	15%
F200-SP05	20	3	15%
F200-SP07	21	3	14%
F200-TES	17	3	18%
F200-TPSS 1	25	4	16%
F200-TPSS 2	28	4	14%
F200-TPSS3	28	4	14%
F200-TPSS 4	28	4	14%
F200-TPSS 5	31	5	16%
<b>TOTAL</b>	<b>998</b>	<b>150</b>	<b>16%</b>

### AP 3000 Security Summary

Contract	CI Total	Sampling	Percentage
F200-COMM	9	4	44%
F200-GW S1	20	3	15%
F200-GW S2	20	3	15%
F200-GW S3	20	3	15%
F200-S03	41	6	15%
F200-S05	37	6	16%
F200-S07	39	5	13%
F200-SIG	4	1	25%
F200-SP03	39	6	15%
F200-SP05	35	6	17%
F200-SP07	30	6	20%
F200-TPSS 1	4	1	25%
F200-TPSS 2	4	1	25%
F200-TPSS3	3	1	33%
F200-TPSS 4	4	1	25%
<b>TOTAL</b>	<b>309</b>	<b>53</b>	<b>16%</b>

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### **Talson's audit procedures included the following:**

- Facilitated an Audit Entrance Meeting with applicable personnel on September 17, 2025
- Assessed relevant compliance documentation including prior audit reports, SSCP, SSMP, and Preliminary Hazard Analysis, dated May 19, 2016
- Selected 203 out of 1,307 non-duplicate closed CIs for Safety and Security Testing at a minimum of 15% for Audit Profile 3000 Testing
- Reviewed uploaded documentation and notations within each CI
- Completed Audit Profile 3000 Testing Checklists/Workpapers
- Conducted a Closeout Briefing with preliminary results on October 15, 2025
- Produced audit draft and final reports
- Continued discussion with Safety Division management regarding audit results

### III. FINDINGS

The audit resulted in **zero (0) findings**.

### IV. RECOMMENDATIONS

The audit resulted in **one (1) recommendation**:

#### **Recommendation No. 1 – Uploaded documentation into SSIMS was incorrect or missing references.**

Talson observed that five (5) out of two-hundred and three (203) CI forms (3%) sampled within SSIMs had no references and/or supporting documentation links or had incorrect and/or missing references to uploaded documents. All five (5) CI forms have since been corrected by the Sound Transit FWLE Safety Team after a preliminary findings meeting was held on October 7, 2025.

In certain instances, the documents listed within the SSIMS field "Construction Conformance" did not align with the titles displayed on the corresponding uploaded PDF documents. Additionally, one of the CIs included additional references to documents not required. The Safety team has since removed the extra language. Talson believes that the titles of uploaded documents correspond to those referenced, and that all supporting documents are uploaded rather than referenced, would enhance clarity and facilitate verification of compliance. As a result, all five (5) of the CI forms were rated as Conditional Acceptable, as follows:

#### **Conditional Acceptable:**

- Contract F200-COMM – CI No. 3569: The document titled "DSUB-02291-07-F200-REC-09576SUB251020-007.0011.03C.4FieldControlSystem AddlProductData.pdf" does not match the title displayed on the corresponding uploaded PDF document. Auditors confirmed that the document referenced was correct; however, was missed labeled. The document has been renamed to match the title.

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- Contract F200-COMM – CI No. 3601: The Inspector's Daily Report titled "FWDS4\_WA3.8B," referenced in the "Construction Conformance" field, does not match the title name displayed loaded to SSIMS. Talson verified that the document name has been revised.
- Contract F200-OCS – CI No. 3766: The document SUB-03617-06-F200-REC-16573 SUB 342369-033.001 3.03 Electrical Continuity Loop Resistance Dielectric and Hi-Potential Test Reports.pdf is not available in SSIMS. This has since been corrected by the Sound Transit team.
- Contract F200-S03 – CI No. 2967: The Matrix (ITP), 12 93 00 - 3.04 being confirmed via CN01 Inspection Daily Report (IDR) is okay. Auditors would like to see a separate tie-out in SSIMS. Discussed with Safety team, the document is not required but Safety should have caught the narrative and made adjustment or addressed it. Talson verified with Safety that the language was adjusted.
- CI No. ID 4082 – Not all required conformance documentations were listed out in SSIMS. The documents were available for review. These documents should be listed out in the Build / Field Installation Section. The Safety team determined that documents were not listed out and have corrected the issue. Talson verified that the documents have been listed.

### V. Management Response Forms (MRFs)

Recommendations can be addressed separately, but a management corrective action should be submitted within 30 days of the final distribution of this report and corresponding MRFs. Verification of conforming corrective action and root cause explanation will be reviewed by Talson upon submission of the Management Response Form by Sound Transit. Below are the definitions of a Finding and a Recommendation, along with the acceptable response requirements:

- Findings** indicate areas where Sound Transit or another entity is non-compliant with its own established policy, plan, procedure and/or regulation and which must be corrected, and documented in writing on a corrective action plan. Action plans should also include a specific, measurable amount of time it will take to correct the issue and reduce risk.
- Recommendations** do not mean the issue is deficient; however, the auditor has determined that the issue poses the potential risks of becoming a finding in the future if recommended changes are not put in place to prevent occurrence.

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### VI. DISTRIBUTION

Safety and Security  
Audit Dates: September - October 2025

Organization: Sound Transit (Auditee)

Responsible Party: Andrea Trepadean, Chief Safety Officer (Auditee)  
Linneth Riley-Hall, Executive Project Director, FWLE

Talson Auditor(s): Ken Brzozowski, Yvette Suarez, Norman Jones, Liam Ryan (Auditors)

Report To: Patrick Johnson, Deputy Executive Director, Internal Audit Division

Distribution List: Andrea Trepadean, Chief Safety Officer, Sound Transit  
Linneth Riley-Hall, Executive Project Director, FWLE, Sound Transit  
Benjamin Marx, *Acting* Executive Director, Service Delivery, Sound Transit  
Branden Porter, Deputy Executive Director of Safety, Sound Transit  
Paul Fitzpatrick, Deputy Executive Director, Sound Transit  
Sepehr Sobhani, Deputy Executive Project Director, Sound Transit  
Randy Kroum, Director – Asset Transition Office (ATO), Sound Transit  
Heather Wright, Deputy Director – Internal Audit, Sound Transit  
Jim Ottman, Compliance Audit Manager, Sound Transit  
Josiah Durham, Transportation Safety and Security Manager, Sound Transit  
Bien Mai, Transportation Safety and Security Manager, Sound Transit  
Michael Flood, Senior Compliance Auditor, Sound Transit  
Molly Hughes, Public Transportation Safety Administrator, WSDOT  
Andrew Royer, State Safety Oversight Program Administrator, WSDOT  
Ryan Sigurdson, Transportation Planning Specialist, WSDOT  
Jennifer Morrow, Safety Oversight Specialist, WSDOT