Safety Certification Audit Report

Project: **Pinehurst Infill Station**

Audit Type: **Safety and Security Certification Audit**

PREPARED BY:

Deanna Anthony Digitally signed by Deanna Anthony
Date: 2026.10.15 08:53:54 -07'00'

Deanna Anthony – Sr. Compliance Auditor, Internal Audit Division Date: 10/15/2026

APPROVED BY:

Jim Ottman Digitally signed by Jim Ottman
Date: 2026.10.20 09:15:44 -07'00'

Jim Ottman – Compliance Audit Manager, Internal Audit Division Date: _____

APPROVED FOR ISSUE:

Patrick Johnson Digitally signed by Patrick Johnson
Date: 2026.10.20 09:31:28 -07'00'

Patrick Johnson – Deputy Executive Director, Internal Audit Division Date: _____

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I. EXECUTIVE SUMMARY

Commencing May 2026 and extending through September 2026, Sound Transit Internal Audit performed a Safety and Security Certification Audit (SCA) of Sound Transit's Pinehurst Infill Station project. This audit evaluated process compliance and safety governance controls. **Technical review of Certifiable Items remains the responsibility of agency subject matter experts.** The audit focused on the following areas in accordance with project progression and timeline:

Audit Profile 1000:

The purpose of Audit Profile 1000 is to ensure the completeness and integrity of project hazard identification ensuring certifiable items (CI) for predefined hazards are identified in the Preliminary Hazard Analysis (for Safety) or the Threat Vulnerability Assessment (for Security).

Audit Profile 2000:

The purpose of Audit Profile 2000 is to ensure that mitigation efforts related to final design have been incorporated into the appropriate design drawings and specifications and that they have been signed off on by Sound Transit Safety in accordance with agency guidelines. Documentation must be uploaded into the safety database under each respective certifiable item.

Audit Profile 3000:

The purpose of Audit Profile 3000 is to ensure that mitigation efforts related to construction have been incorporated and signed off by Sound Transit Safety in accordance with agency guidelines. Documentation must be uploaded into the safety database under each respective certifiable item.

Audit Profile 4000:

The purpose of Audit Profile 4000 is to ensure Integrated and Pre-Operational Testing were completed where noted as required.

Audit Profile 6000:

The purpose of Audit Profile 6000 is to assess the application and effectiveness of compliance and execution of Operations and Maintenance Readiness processes in preparation for revenue service.

Audit Profile 7000:

The purpose of Audit Profile 7000 is to assess the application and effectiveness of compliance and execution of Systems Readiness, Fire/Life Safety Requirements, and Safety Certification Reports.

Audit Profile 8000:

The purpose of Audit Profile 8000 is to assess Pre-Revenue Operations Readiness. Specific activities include focusing on compliance with FTA's Oversight Procedure 54 (OP54) and requirements for Safety & Security and Pre-Revenue Operations as well as review of the process for addressing remaining issues through near and long-term corrective actions.

Internal Audit found that activities being performed generally aligned with the safety and security certification processes and conformed to the Agency's Safety and Security Certification Plan (SSCP). The sum impact of the audit testing resulted in zero (0) findings and six (6) observations.

The identified observations are not considered to pose an immediate risk to safety or to the successful transition of the project into operations.

II. SCOPE AND METHODOLOGY

The audit was conducted to ensure that system hazards were effectively identified from preliminary engineering to revenue service inclusive of certifiable item traceability and mitigation efforts. An Audit Exit meeting was facilitated on **October 6, 2026,** with project team members, Sound Transit management, and the Washington State Department of Transportation's (WSDOT) Rail Safety Oversight Program Administrators. Continued discussions relating to the observations and potential corrective actions will continue after the Exit meeting.

Notable documentation referenced during the audit included:

- Agency Safety and Security Certification Plan (SSCP) R 7.0
- Project Specific Pinehurst Safety and Security Management Plan (SSMP)
- Agency Safety and Security Management Plan (SSMP) R 9.0
- Preliminary Hazard Assessment (PHA)
- Threat Vulnerability Assessments (TVA)
- Facilities Management Plan (FMP)
- Link Light Rail Maintenance Management Plan
- Pinehurst Safety Certifiable Items List
- Transportation Safety and Security SOPs
  - TSS-SOP-TSS11-Design Conformance Verification R2.0
  - TSS-SOP-TSS17-Safety and Security Design Review R1.0
  - TSS-SOP-TSS19-Construction Conformance Verification R1.0
  - TSS-SOP-TSS14-OHA R2.0
  - TSS-SOP-TSS13-SSCVR R4.0
- Emergency Management Reports and After Actions
- Safety and Security Information Management System (SSIMS) Project Dashboard
- Security Operations Training Memo and Post Orders
- Pinehurst Station Temporary Certificate of Occupancy
- Infosec Memorandum
- Pinehurst Open Certifiable Item Workarounds
- Systems Integration Testing (SIT) Plans and Test Results
- Pinehurst SIT 505 Status and Mitigations Memo
- King County Link Operator Training Plan and Training Records
- WSP Site Specific Hazard Analysis Report – Operator Familiarization
- Safety Certification Tracker Excel Spreadsheets
- Safety Committee Meeting Minutes and Records of Decision
- Operational SOPs, Memos and Plans

- SSIMs Database Drawings, Specifications, Material Requirements and Other Documents

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

- **Acceptable:** No deviation from the implemented SSCP or 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 resulted in a nonconforming product or service. Corrective action must be documented formally and include a root cause analysis.

Safety Certification Audit Methodology

Safety and Security Audit Profile 1000 – Preliminary Hazard Assessment (PHA) and Threat and Vulnerability Assessment (TVA)

- Assessed the process of identifying hazards and threats within the PHA, TVA and any other associated hazard assessments.
- Reviewed a sample of approximately 15% of certifiable items, tracing their origination back to the PHA and TVA. Hazard assessments for the sample items were verified as completed without exceptions.
- Key documents reviewed included the Preliminary Hazard Assessment, Threat and Vulnerability Assessment, Agency Safety and Security Certification Plan (SSCP), Agency Safety and Security Management Plan (SSMP), and Project Specific (Pinehurst Infill Station) SSMP.

Audit Profile 1000 Verification of Hazard Assessment Results:

- Integrity sampling of preliminary hazards within the TVA and PHA resulted in 100% *Acceptable* testing.

Safety and Security Audit Profile 2000 – Design Conformance Verification

- Assessed safety and security criteria incorporated into design to support the mitigation of a Certifiable Item.
- Reviewed the final design phase by selecting a sample of approximately 15% of certifiable items for the project. Key documents reviewed included safety approvals of final designs, drawings, and specifications.

Audit Profile 2000 Verification of Final Design Results:
Summary details of the testing performed in conjunction of Audit Profile 2000 Final Design resulted in the following:

Internal Audit concluded that, of the 33 certifiable items sampled, thirty-one (31) were deemed *Acceptable (%)* and two (2) were deemed *conditionally acceptable* (%) requiring corrective actions.

The *Conditionally Acceptable rating was mostly due to missing references and/or documents within SSIMS.* The two conditionally accepted certifiable items were corrected within the timeframe of the audit.

Final Design Conformance Certifiable Items						
Total CIs	IDs Sampled	Acceptable	Unacceptable	Conditionally Accepted	Not Applicable	Comments
222	33	31	0	2	0	Missing Design Specs or Drawings

Safety and Security Audit Profile 3000 – Construction Conformance Verification

- Verified that Safety signed off on construction hazards being mitigated according to the hazard analyses and the "Safety and Security Requirements" SSIMS fields.
- Reviewed the construction conformance phase by selecting a sample of approximately 15% of certifiable items for the project. Key documents reviewed included inspection reports, resident engineer summary memos, photos, product data sheets, and other notable info within the SSIMs database.
- Reviewed meeting minutes and records of decisions made during the Lynnwood and Pinehurst SSCRS committee meetings.

Audit Profile 3000 Verification of Construction Conformance Results:

Summary details of the testing performed in conjunction of Audit Profile 3000 Construction Conformance resulted in the following:

Internal Audit concluded that, of the 33 certifiable items (CIs) sampled, twenty-five (25) were deemed *Acceptable (%)* and eight (8) were deemed *conditionally acceptable* (%) pending final close out by safety. The *Conditionally Acceptable rating was due to CIs remaining open with workarounds into revenue service.* Should the remaining eight (8) sampled open items follow documented SSCP/SSMP processes to closure, these items would be noted acceptable.

Construction Conformance Certifiable Items						
Total CIs	IDs Sampled	Acceptable	Unacceptable	Conditionally Accepted	Not Applicable	Comments
222	33	25	0	8	0	Conditionally accepted items remain open with workarounds implemented by Safety. Pending closure and tracking post revenue service.

Safety and Security Audit Profile 4000 – Integrated and Pre-Operational Testing

- Verified safety and security integration tests were completed where noted as required.

- Key documents to be reviewed include the System Integration Test Plan, test result reports, safety approvals, and final System Integrated Testing (SIT) memorandum.
- Internal audit reviewed past SIT plans compared to the Pinehurst Infill Station plan. Documentation provided by project teams explained reasoning for SIT plan modifications.

Performance of Audit Profile 6000 – Operations and Maintenance Readiness

Assessed the application and effectiveness of compliance and execution of Operations and Maintenance Readiness. Specific focus included:

- Reviewed a sample of approximately 15% of certifiable items to ensure:
    - Contracted and internal training is planned and progressing for completion to minimize risk and mitigate system safety hazards.
    - The Rule Book, Standard Operating Procedures, and Standard Maintenance Procedures were updated or developed as required to support system safety certification.
    - Relevant Safety Plans and Procedures associated with operational safety conformance were updated as required to support system safety certification.

NOTE: The audit identified a document control weakness involving the Facilities Operations & Maintenance Plan (FAC-PLN-10003/AGY-OPS-PLN-0025), which had been submitted as Safety Certification operational conformance documentation for multiple station openings but was later removed from circulation and could not be located. The lack of clear ownership and document management created uncertainty over the availability and maintenance of this key safety document, increasing the risk that Safety may be unable to effectively verify or maintain hazard mitigations associated with certifiable assets from the associated plan.

During the audit, the plan was updated and provided to the audit team for verification. While corrective action was taken and the document has since been reissued, this matter highlights the opportunity to strengthen document control processes and ensure critical safety documentation remains current, accessible, and properly governed. This is not being reported as a finding or observation and has been discussed with management; however, it is documented here for awareness and future considerations.

Performance of Audit Profile 7000 – System Readiness, Fire/Life Safety

Assessed the application and effectiveness of compliance and execution of Systems Readiness, Fire/Life Safety Requirements, and Safety Certification Reports. Specific focus included assessing:

- Relevant Certificates of Occupancy to assess the status of temporary provisions and resolutions of issues related to Fire Department requirements.
- Observed first responder familiarization training/emergency drills and exercises and reviewed follow up memorandums provided by Sound Transit Emergency Management.
- Confirmed contracted security and law enforcement training was completed with Sound Transit Security Operations.
- Confirmed security staffing plans and post orders were drafted with Sound Transit Security

Operations.

Performance of Audit Profile 8000 – Pre-Revenue Operations Readiness

Assessed Pre-Revenue Operations Readiness. Specific activities included focusing on compliance with FTA's Oversight Procedure 54 (OP54) and requirements for Safety & Security and Pre-Revenue Operations as well as reviewing the process for addressing remaining issues through near-and-term corrective actions. Internal Audit activities included:

- Attending Rail Activation meetings prior to station opening.
- Attending in person agency readiness site walks with staff at Pinehurst Station.
- Randomly tested that Fire/Life Safety, Emergency Preparedness, Safety and Security requirements have been met.
- Observed and reviewed Link Light Rail operator familiarization training ensuring a 75% completion rate before revenue service.
- Confirmed with Sound Transit Security Operations that contracted security developed post orders for the new station.
- Ensured transfer of responsibilities to Operations and that staffing and training timelines were aligned.
- Reviewed all open items and workarounds with Sound Transit Safety. Ensured processes were followed to reduce the risk as identified.

Internal Audit randomly selected roughly 15% of the 222 certifiable items that were populated in SSIMS during the July timeframe for review.

Interviews were conducted with project personnel and certification standards were reviewed for preliminary hazard consistency and integrity.

III. FINDINGS

Findings are the results of the evaluation and verification of evidence against audit criteria showing non-compliance with a policy, procedure, manual, or standard.

The audit resulted in **zero (0)** findings of non-compliance.

IV. OBSERVATIONS

Observations are **recommendations** for issues that may be compliant with requirements, but 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.

Recommendations will not be assigned to a formal "Management Action Plan" during the audit reporting process. However, auditors will continue to advise the responsible parties to consider appropriate actions regarding the recommendations. Submission of a formal response is optional.

The audit resulted in the following a total of **six (6)** recommendations as opportunities for improvement:

Recommendation No. 1

We recommend implementing a document control process to track, review, and validate changes to operational conformance documentation before it is uploaded to SSIMS as a safety certification record.

The review process for operational conformance documentation should be strengthened to ensure documents used for safety certification remain current, accurately reflect system changes, and are updated in a timely manner before being uploaded to SSIMS.

During the audit, outdated plans were identified, including the Link Light Rail Maintenance Management Plan, which did not reflect Pinehurst Station despite being used to support safety certification activities. Although the document was subsequently reviewed, updated, and resubmitted to Safety, the issue highlights the need for a formal change-tracking and document control process to ensure safety certification records are based on current and accurate documentation.

Recommendation No. 2

We recommend establishing and documenting safety certification phase gates, timelines, and completion criteria to ensure safety certification activities are substantially complete before revenue service dates are established.

The revenue service date was selected for Pinehurst Infill Station prior to significant completion of safety certification.

As of September 8th, with two (2) days remaining to close out certifiable items, the project was only 86% complete with safety certification.

- 76.6% construction conformance completion
- 45.5% integrated testing completion
- 84.1% operational conformance completion
- 36 certifiable items remained open, pending approved workarounds.

Safety certification is designed to close all certifiable items before revenue service. While approved workarounds can mitigate risk, the condition highlights the need for documented and formally approved safety certification phase gates and completion thresholds to support informed decisions when establishing revenue service dates.

Recommendation No. 3

We recommend establishing a formal Safety Certification training program that assigns both a lead TSS Specialist and a designated backup TSS Specialist to capital projects.

Pairing less experienced specialists with senior staff creates a structured learning environment, promotes knowledge transfer, and builds certification expertise across the team.

Reliance on a single Safety Specialist creates capacity and continuity risks. For example, the Safety Specialist assigned to the Pinehurst project documented 161 certifiable item reviews during the last month of the project, while additional items remained pending review. Final project certification activities continue to represent a significant workload concentrated on a single individual.

Implementing a Safety Certification training program would:

- Reduce the risk of delays in meeting project and agency timelines.
- Minimize single-point-of-failure risks by providing qualified backup personnel for each project.
- Distribute workloads more effectively and reduce the potential for staff burnout.
- Build safety certification knowledge and capabilities across teams, increasing organizational resiliency.

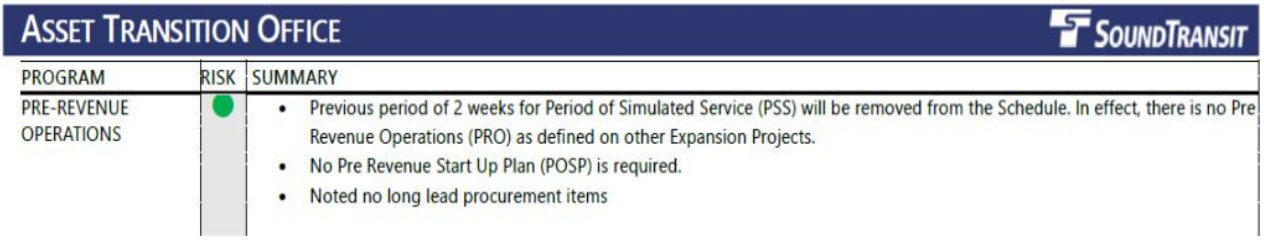
By developing certification expertise across multiple specialists, Safety can strengthen succession planning, improve operational resilience, and enhance the long-term effectiveness of the safety certification program.

Recommendation No. 4

We recommend developing a formal record of decision process for rail activation meeting decisions and documenting the process within the project specific Rail Activation Plan.

The Pinehurst Rail Activation team experienced communication and documentation delays regarding Link light rail operator familiarization training as it pertains to FTA OP 54 requirements. Rail Activation advised that it was decided during a meeting that no pre revenue start up plan (including operator familiarization training) was required for Pinehurst since it was an infill station. Key stakeholders later disagreed with this decision requesting that operator familiarization training be added to the activation plan.

Rail Activation personnel provided meeting minutes from October 2025 to support the decision however, the records did not clearly document the decision-making rationale, participants involved, alternatives considered, or final approvals. As a result, the basis for the decision could not be readily verified, highlighting the need for a more robust decision documentation process.



ASSET TRANSITION OFFICE — SOUNDTRANSIT

PROGRAM	RISK	SUMMARY
PRE-REVENUE OPERATIONS		• Previous period of 2 weeks for Period of Simulated Service (PSS) will be removed from the Schedule. In effect, there is no Pre Revenue Operations (PRO) as defined on other Expansion Projects. • No Pre Revenue Start Up Plan (POSP) is required. • Noted no long lead procurement items

Rail activation meeting minutes October 2025

Recommendation No. 5

We recommend that Sound Transit Safety work with the safety certification database vendor to resolve SSIMS database deficiencies to ensure safety certification records are complete, accurately retained, and reliably transferred through all project phases.

During the audit, several certifiable items were missing Final Design phase documentation within SSIMS. Review of the records indicated that documentation had been entered; however, certain certifiable items did not advance to subsequent phases as intended, resulting in incomplete documentation within the system. Examples included Certifiable Item IDs 255 and 262.

Resolving these system deficiencies will improve the reliability and completeness of safety certification records, reduce the risk of missing critical documentation during project reviews, and support accurate tracking of certifiable items throughout the project lifecycle. In addition, strengthening SSIMS functionality will enhance data integrity, improve auditability, and increase confidence that safety certification requirements are properly documented and verified before project completion.

Recommendation No. 6

We recommend Sound Transit Safety and Rail Activation to conduct a "lessons learned" workshop with the project team following the activation of Pinehurst Station.

Pinehurst Station was Sound Transit's first infill station project, creating an opportunity to capture lessons learned and establish a roadmap for future infill station activations. Documenting successful practices, challenges, and improvement opportunities could help streamline future projects and provide greater organizational clarity and consistency.

Project team members identified several areas for review, including King County Metro track access permit process and right-of-way protection requirements for construction personnel. The project experienced delays related to Employee in Charge (EIC) availability and track access permit scheduling. As a result, the team recommended incorporating track access permit requirements and related training into future infill station construction contracts.

The project team also encountered challenges associated with constructing and approving safety barriers to establish safe work zones adjacent to active rail operations. Documenting barrier specifications, safety assessments, and approval requirements could improve planning and execution for future infill station projects.

V. CONCLUSIONS / REQUIREMENTS

Internal Audit found that the overall certification activities align to the Agency's Safety and Security Certification Plans with minor recommendations for suggested enhancements.

VI. DISTRIBUTION:

Audit Dates:	May 2026 – October 2026
Organization:	Sound Transit
Responsible Party:	Josiah Durham, Director, Transportation Safety & Security
Auditor(s):	Deanna Anthony
Distribution List:	Andrea Trepadean, Chief Safety Officer, Safety Kerry Pihlstrom, Executive Director, Asset Transition Office Michelle Walker, Executive Director, Facilities Patrick Johnson, Deputy Executive Director, Internal Audit Branden Porter, Deputy Executive Director, Safety Paul Fitzpatrick, Deputy Executive Director, Activation Taylor Caroll, Deputy Executive Project Director, Capital Delivery Linda Morud, Construction Manager, Capital Delivery Drew Peters, Senior Rail Activation Manager Joshua Morley, Manager, Transportation Safey & Security Christi Hendrickson, Sr. Safety & Security Specialist Jim Ottman, Compliance Audit Manager Andrew Royer, WSDOT SSO