

<b>HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT PMOC COMMENT SHEET</b>	REVIEWER: Jacobs / Virginkar & Associates / Interactive Elements
	REVIEW DATE: April 27, 2010
DOCUMENT NAME: Safety and Security Certification Plan, Rev. 0	RESPONDER:
DOCUMENT DATE: February 19, 2010	RESPONSE DATE:

COMMENT NUMBER	SECTION NO.	PAGE NO.	COMMENT TYPE	COMMENT	RESPONSE	ACTION CODE	DISP. CODE
1	Cover Page		M	Suggest the RTD General Manager sign the cover page. The Chief Project Officer should sign the concurrence page.			
2	General Comment		M	The revision number (Rev. 0) is missing from the cover and all pages of the document. There are different dates on the cover (February 28, 2010), than in the Revision History and on the pages (February 19, 2010). A controlled document should show the same Revision Number and date (month, day, and year) on every page, in the Revision History, and on the cover. If the document bears approval signatures, as this SSCP does, then the revision date cannot be earlier than that of the final approval. In this case, with the final approval on February 28, 2010, the Revision Date should have been 2/28/20, or later. The correct revision number and date should appear on the cover, in the Revision History, and on every page of the SSCP.			
3	General Comment		D	Suggest adding a sample Specification Conformance Checklist to the Appendix similar to Figure 11 in the FTA, Handbook for Transit Safety and Security Certification, Final Report dated November 2002.			

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4	General Comment		D	The need for additional tests, however, may arise for various reasons throughout the project. To request and record the performance of additional tests, the PMOC suggests the RTD prepare a formal Test Description Sheet. A sample Test Description Sheet is provided in Figure 14 in the FTA, Handbook for Transit Safety and Security Certification, Final Report dated November 2002.			
5	General Comment		D	Suggest adding a sample System Integration Testing Sheet to the Appendix similar to Figure 16 in the FTA, Handbook for Transit Safety and Security Certification, Final Report dated November 2002.			
6	General Comment		D	The SSCP is a vital project record document and, as such, should contain the final Certifiable Elements List, detailed to the Certifiable Items within each element. This list will be revised as the project progresses and its revision should not necessarily mandate a revision of the SSCP. Until it is finalized, the CEL should be maintained as a stand-alone appendix to the SSCP, which will not be affixed to the SSCP until it is in its final form at the completion of the project. A single page appendix should be added to the SSCP, providing this information, the CEL appendix letter designation, and the custodian of the stand-alone CEL as it is being developed.			
7	1.1 and following	1-1 and following	M	At the beginning of the 6 <sup>th</sup> line on page 1-1, revise "State Safety Oversight Agency" to "State Oversight Agency (SOA)." All following references to the State Safety Oversight Agency should be revised to "State Oversight Agency" or "SOA."			

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8	1.2	1-1	D	Since RTD is not yet a rail operating agency, it does not have a safety and security certification program, which would typically be described in the SSPP developed in compliance with SOA requirements. The only appropriate certification reference, therefore, for this project is this specific SSCP. In light of this, the word, "Program," should be removed from the 1 <sup>st</sup> line of Section 1.2, which should be revised similar to: "The purpose of the Project Safety and Security Certification Plan is..."			
9	1.3	1-2	M	The FTA definition (49 CFR Part 659) should be used for System Safety Program Plan (SSPP). What is described at the bottom of page 1-2 is a contractor performance plan. In addition to correcting the SSPP definition, definitions should be added for "Safety and Security Management Plan (SSMP)" and "System Security Plan (SSP)."			
10	1.5	1-3	D	This section begins by stating that: "The City will self certify..." which implies SOA approval will not be required. This may, in fact, be the case but that will not be known until the SOA publishes the Program Standard. In light of this, it would be better to begin with a revised phrase, similar to, "Unless the SOA specifies differently, the City will self certify..."			
11	1.6	1-4	M M	a) In the 1 <sup>st</sup> line, delete the word, "Program." b) In the 1 <sup>st</sup> bulleted item, add the words, "safety and," before the word, "security."			
12	2.0	2-1	M	Suggest adding a new subsection 2.7 to describe the role and responsibilities of the State Safety Oversight Agency (SSOA), as it is a key participant in the project safety & security program and will be involved in Operational Readiness Reviews.			
13	2.3.1	2-2	E	Change PMC to PMSC to be consistent with the PMP.			

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14	2.4.1	2-5	M	<p>The sentence that begins on the 6<sup>th</sup> line of the 2<sup>nd</sup> paragraph and reads, "The RTD SSM will remain in an "oversight" function and hold the ultimate responsibility for assuring all safety and security certification activities have been completed,"</p> <p>Since a contractor employee is currently filling the RTD SSM position, he/she cannot have the ultimate responsibility for certification assurance. We suggest the sentence be revised, similar to: "The RTD SSM will oversee CSC SSM activities for RTD, but the ultimate responsibility for assuring that all safety and security certification activities have been completed rests with the RTD GM."</p>			
15	2.5	2-7	M	<p>The last two bulleted items on the list of SSORC responsibilities give the committee ultimate approval authority that belongs to the RTD GM. Language in those bulleted items should be changed to indicate that the SSORC will "review and recommend for RTD GM approval."</p>			
16	2.5	2-7	D	<p>It would be useful to indicate the committee meeting frequency, similar to: "The SSORC will meet at least monthly, but as frequently as required to keep pace with project certification demands."</p>			
17	2.7	2-9	M	<p>First paragraph states "Project Contractors will be required to develop Safety and Security Certification Milestones and Deliverable Schedules." Please clarify if these milestones and deliverable schedules will be included in the Master Project Schedule being tracked by the RTD.</p>			
18	3.1	3-1	D	<p>Replace the opening phrase, "The Certification Program," with the word, "Certification."</p>			
19	3.2	3-1	M	<p>First paragraph states "and other applicable operating plans and procedures". Suggest listing all the operating plans and procedures required.</p>			

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20	3.3.1	3-3	M	Section 1.4 Scope provides an overview of safety & security certifiable elements for Systems, Fixed Facilities, and Safety / Security / Operational / Maintenance Plans & Procedures. However, this section appears to have only an abbreviated list. This SSCP should include a Table providing a comprehensive itemized list of all project certifiable elements and sub-elements.			
21	3.3.1.3	3-4	M	The last sentence in the first paragraph should be revised to indicate that the SSORC will review and recommend for approval by the RTD GM.			
22	3.3.1.3	3-4	M	The last sentence of the 2 <sup>nd</sup> paragraph should be revised to indicate that the CELs were formally submitted to the SSORC for review and approval recommendation to the RTD GM.			
23	3.3.2	3-5	E	In the last sentence prior to the list, the word, "Security," should begin with a lower case "s" to conform to first sentence in the paragraph.			
24	3.3.5	3-8	E	Correct the typo " <i>Contractor's</i> " to " <i>Contractors</i> " in 2 <sup>nd</sup> and last paragraphs.			
25	3.3.5	3-9	M	In the 1 <sup>st</sup> and 3 <sup>rd</sup> paragraphs of Stage 2, references made to SSORC approvals should be revised to indicate approval recommendations to the RTD GM.			
26	3.3.6.1	3-9	M	As written, the section refers to contractually required tests. Integration Testing is a separate certifiable element. In light of this, the first sentence should be revised to reference only the construction phase and eliminate integration testing, similar to: "During the construction phase, many contractual and tests are conducted for the purpose of verifying proper operation of equipment being furnished and constructed for the Project."			
27	3.3.6.1	3-9	E	Add a period at the end of the last sentence in the 2 <sup>nd</sup> paragraph.			
28	3.3.6.3	3-10	E	Correct the typo " <i>An Integration Test Permit (Appendix D)</i> " to " <i>An Integration Test Permit (Appendix C)</i> ".			
29	3.3.6.3	3-10	M	In the section title and in following test, change the word, "integrated," to "integration," when referencing System Integration Testing (SIT).			

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30	3.3.6.3	3-10	M	While it is recognized that the construction phase will be continuing on other segment phases, SIT cannot begin on any segment until the construction phase on that segment is complete. In light of this, the opening sentence of this section should be revised to read similar to: "During the testing and start-up phase of the Project, system integration tests and pre-operational tests are conducted in accordance with the RTD approved System Integration Test Plan (SITP). These tests are needed to verify proper operation, functionality, and compatibility of equipment and systems."			
31	3.3.6.3	3-10	M	This section should be expanded to clearly indicate that SIT is a Certifiable Element and that the System Integration Test Plan will detail the process by which the individual tests will be conducted, documented, approved, and certified for each segment and final integration of all segments into the end-to-end LRT system.			
32	3.3.6.3	3-10	E	Correct the typo " <i>Temporary Use Permit (Appendix E)</i> " to " <i>Temporary Use Permit (Appendix D)</i> ".			
33	3.3.7	3-10/3-11	M	This section covers a variety of start-up elements and describes a reasonable certification process. While detailed plans are written, and approved by RTD, for design, construction, and testing, the inclusion and criteria requirements for the start-up elements referenced in this section is less defined.  For example, past experience on other projects has been that questions on training syllabuses, numbers and titles of trainees, responder personnel to be trained, and documentation requirements were still open even as personnel were being trained. In particular, the scope of security and safety related training for RTD personnel and responder personnel was not always adequately defined.			

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34	3.3.7	3-10/3-11	M	Records by the transit agency and responder agencies of who had been trained were not always properly maintained. With the result that certification of the adequacy of safety and security training was, in fact, improper because records could not be produced to assure all personnel received required training. These issues must be addressed in establishing the certification criteria for training.			
35	3.3.7	3-10/3-11	M	This section should be expanded to describe a process for defining requirements and approving submittals for training and the other start-up elements, and for maintenance of compliance documentation by all involved parties.			
36	3.3.7	3-10/3-11	M	The SSCP should also clearly identify each of the Start-up elements. This can be done by including a list of these elements, along with the Certification Form, in Appendix E. Item detail can be added as they are identified and the submittals approved.			
37	3.3.8	3-11	M	It is stated " <i>The CSC SSM will develop and manage the Open Items List and report its status to the RTD.</i> " It is not clear why CSC SSM is developing & managing this list, since it is for project-wide open safety & security items and broader than CSC contracts elements. Suggest this list should be managed by GEC SSM.			
38	3.3.8	3-12	M	Language should be added to this section indicating that the RTD GM must approve any resolution to an open item that is other than complete conformance.			
39	3.3.10	3-12	M	It is stated that operational readiness will be performed by RTD staff, RTD SSM, Honolulu Police Department, and Honolulu Fire Department. But does not include Hawaii SSOA or FTA as stated in Section 3.2 " <i>...Operational Readiness Reviews to be conducted by the Hawaii State Safety Oversight Agency and/or FTA.</i> " Suggest adding description to the process for accommodating such reviews by SSOA and/or FTA.			

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40	3.3.10 3.3.10.1	3-12/3-13	M	This Section, titled Step 10 - Verify Operational Readiness, and its single Subsection, titled Emergency Drills, are out of sequence. Emergency Drills are almost always performed during SIT, since responders must be trained prior to start of train operations during Pre-Revenue Operations (PRO). This timing is especially critical when segmental operations are planned. Section 3.3.10.1 should be renumbered as 3.3.6.4 and immediately follow the SIT description. The text should be revised to indicate that the Emergency Drills will be performed as part of SIT and procedures and schedule will be included in the SITP. Also, that as the PRO Plan is developed, it may be decided to repeat some emergency Drills as training exercises during PRO.			
41	3.3.10 3.3.10.1	3-12/3-13	M	The brief text in Section 3.3.10 should be expanded into a better description of PRO and be relocated as new Subsection 3.3.6.5 to follow the relocated Emergency Drills subsection.			
42	3.3.10 3.3.10.1	3-12/3-13	E	In revising the Emergency Drills text, remove the misplaced period after the word, "Emergency," in the fourth line of the paragraph.			
43	3.3.10.1	3-13	E	Correct the typo " <i>The CSC will submit an Emergency. Preparedness Plan</i> " to "Emergency Preparedness Plan".			
44	3.3.11, 2 <sup>nd</sup> paragraph	3-13	M	Since GEC SSM is also responsible for overseeing the overall process and is responsible for ensuring completion of checklists, he should be a signatory to the Project Safety and Security Certificate.			
45	3.3.12 1 <sup>st</sup> paragraph	3-14	M	Other than receiving final Safety and Security Certification Verification Report (for informational purposes), please explain any role that Hawaii SSOA will play in the process of issuance of the final Project Safety and Security Certificate.			

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46	3.3.12	3-14	M	The SSCVR must be accepted and signed by the RTD GM prior to any revenue operations. The opening sentence suggestion that the SSCVR may be submitted shortly after revenue operations begin is incorrect. The sentence should be revised similar to: "Prior to start of revenue operations on any segment, the CSC will prepare and submit a Safety and Security Certification Verification Report (SSCVR) to the RTD for review and approval."			
47	3.3.12	3-14	E	The last word in the sentence that ends on the 7th line, should be plural, as "work-arounds."			
48	4.1	4-1	M	The word, "City," at the end of the 1 <sup>st</sup> paragraph should be revised to read, "RTD GM." This would properly identify the responsible approval authority.			
49	4.2	4-1	E	In the 2 <sup>nd</sup> line of the 2 <sup>nd</sup> paragraph of the section, add the word, "the," before the word, "Project."			
50	4.3	4-2	E	At the beginning of the 1 <sup>st</sup> line on page 4-2, delete the word, "an."			
51	4.3	4-2	M	The last paragraph of the section should be revised to indicate that the SSORC will recommend approval by the RTD GM.			
52	4.3	4-2	D	Third paragraph states "completed Hazards and Vulnerabilities Resolution Certificate of Conformance". Suggest including this certificate to the Appendix.			
53	5.1	5-1	E	On the 3 <sup>rd</sup> line, add a period after the word, "schedule," to end the sentence.			
54	6.1	6-1	M	The last paragraph in the section should be revised to indicate that the GEC SSM has been assigned the activity of tracking and maintaining documentation, which will be overseen by RTD as indicated in the SSMP.			
55	6.2	6-1/6-2	M	This section should be appropriately revised to describe that configuration management procedures require review and recommendation by the Configuration Management Committee (or similar group) and approval by the RTD GM for any deviation from approved design criteria, or change to previously approved designs, materials, or the like.			

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56	7.2	7-1/7-2	M	In the "Description of activities performed for SSC" section, the 2 <sup>nd</sup> and 3 <sup>rd</sup> bulleted items should be combined into a single item, "System Integration Tests and Emergency Drills," and add a new final bulleted item, "Pre-Revenue Operations."			
57	7.2	7-1/7-2	M	To appropriately place responsibility, the last sentence should be revised to read similar to: "Upon SSCRC concurrence, the GEC SSM will submit the report to the SSORC for review and forwarding to the RTD GM for approval. After approving, the RTD GM will deliver the signed SSCVR to the SOA."			
58	Appendix C	C-1	M	Integrated Test Permit – Clarify the signature blocks for "Design-Builder" Systems Engineer and System Engineering Manager since the facilities Design-Builder is not likely to have a Systems Engineer. Please clarify if it is meant to be the CSC. If so, shouldn't "facilities" Project Engineer or Project Manager be added to this signature block, since it may also be necessary for one of facilities contracts to request such a permit? (See for example, Appendix G signature block "Design-Builder Systems/Facilities Engineer").			
59	Appendix C	C-1	M	Shouldn't a signature block be added for CSC SSM, since he is prominently involved in the process as stated in 3 <sup>rd</sup> paragraph of Section 3.3.6.3 "The CSC SSM, in coordination with the GEC will determine the current level of verification for each element involved in the test, and will issue a permit for signature."?			
60	Appendix D	D-1	M	Temporary Use Permit – Clarify the signature blocks for "Design-Builder" Systems Engineer and System Engineering Manager since the facilities Design-Builder is not likely to have a Systems Engineer. Is it meant to be CSC? If so, shouldn't "facilities" Project Engineer or Project Manager be added to this signature block, since it may also be necessary for one of facilities contracts to request such a permit? (See for example, Appendix G signature block "Design-Builder Systems/Facilities Engineer").			

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61	App D App G	D-1 G-1	M	As long as the RTD SSM is a seconded contractor employee, in addition to signing the final SSCVR (Appendix H), the RTD GM should also sign Temporary Use Permits (Appendix D) and Certificates of Conformance (Appendix G). The forms in Appendices D and G should be revised accordingly.			
62	Appendix G	G-1	E	Change "The Certifiable Element conforms with applicable safety and security requirements and may be used for passenger service" to "The Certifiable Element conforms with applicable safety and security requirements and is certified for passenger service"			
63	Appendix H	H-1	M	Project Certificate of Conformance – The signature block " <i>Design-Builder Project Manager</i> " is not defined in the SSCP. Is it meant to be CSC? Please clarify.			
64	Appendix H	H-1	E	Change "The Project Certificate of Conformance Signifies that applicable safety and security requirements have been successfully resolved and that the HHCTCP may be placed in passenger service, with the noted restrictions" to "The Project Certificate of Conformance Signifies that applicable safety and security requirements have been successfully resolved and that the HHCTCP is certified for passenger service, with the noted restrictions".			
65	Appendix H	H-1	D	Suggest adding the CSC General Manager as a signatory.			

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