

# Loy Yang B Power Station

Powering  alintaenergy



## QMS.40 Bushfire Mitigation Plan

For Loy Yang B Power Station – 2022/23

## DOCUMENT CONTROL

Authoriser: General Manager, Loy Yang B	Doc. Group: All Hazards Management
Responsible: General Manager, Loy Yang B	Version: 2.8 - Current
Reviewer: Electrical Safety Scheme Manager	Next Review: 30/06/2023

**TABLE OF CONTENTS**

DOCUMENT CONTROL .....	2
STATION CONTACTS .....	5
1. INTRODUCTION.....	6
2. POLICY STATEMENT .....	7
3. OBJECTIVE .....	7
4. FIRE HAZARD RATING .....	7
5. SCOPE OF ELECTRICAL SYSTEMS.....	8
5.1. NON LOY YANG B HIGH VOLTAGE OVERHEAD LINES.....	8
6. PREVENTATIVE STRATEGIES .....	8
6.1. FIRE RISK ASSESSMENT .....	9
6.1.1 SCOPE .....	9
6.2. MITIGATION STRATEGIES .....	10
6.2.1 PREVENTATIVE MEASURES.....	10
6.2.2 SMOKING CONTROL.....	10
6.2.3 HOUSEKEEPING & MAINTENANCE .....	10
6.3. MANAGEMENT OF LYB OVERHEAD LINES .....	10
6.4. MANAGEMENT OF LYB SITE VEGETATION .....	11
6.5. LYB SITE HOT WORKS .....	11
6.6. HIGH FIRE DANGER AND TOTAL FIRE BAN DAYS .....	12
6.7. MAINTENANCE OF FIRE FIGHTING EQUIPMENT .....	12
6.8. SITE EMERGENCY RESPONSE .....	12
7. TRAINING.....	13
8. EXTERNAL AGENCIES .....	14
9. INVESTIGATIONS .....	14
10. COMMUNICATION OF THE PLAN.....	14
11. MONITORING & AUDITING .....	14
12. CONTINGENCY MEASURES .....	15
13. REFERENCES .....	16
14. APPENDICES .....	18
APPENDIX A – RISK ASSESSMENT CONSIDERATIONS .....	18
1. LOY YANG B 500 KV SWITCHYARD AND TRANSFORMERS.....	18
2. ELECTRICAL HIGH AND LOW VOLTAGE SWITCH, CONTROL EQUIPMENT ROOMS AND CABLE CHAMBERS .....	18
3. BROWN COAL DISTRIBUTION SYSTEM (RISING CONVEYOR & STORAGE) .....	18
4. HYDROGEN STORAGE AREAS .....	18

## QMS.40 Bushfire Mitigation Plan

---

5.	NATURAL GAS PIPELINE AND DISTRIBUTION SUPPLY .....	18
6.	OXYGEN STORAGE .....	19
7.	LOY YANG B FLAMMABLE LIQUID STORE .....	19
8.	LOY YANG B CHEMICAL PLANT .....	19
9.	WAREHOUSE FLAMMABLE LIQUID STORE.....	19
10.	RETURN WATER AND ASH DISPOSAL PIPELINES.....	19
11.	WORKSHOPS .....	19
12.	LYB UNIT CONTROL ROOM (UCR) .....	19
13.	RISK ASSESSMENT DOCUMENTATION .....	20
14.	EXEMPTIONS.....	20
	APPENDIX B – FIRE PROTECTION SYSTEMS .....	20
1.	FIRE DETECTION AND ALARM SYSTEMS. ....	20
1.	WATER SUPPLIES.....	20
2.	WATER MAINS, HYDRANTS AND HOSE REELS .....	21
3.	FIRE SPRINKLER SYSTEMS .....	22
4.	WATCHMAN SERVICES .....	23
5.	FIRE EXTINGUISHERS & OTHER PROTECTION.....	23
	TABLE 1 - LINE (FEEDER) DENOMINATION .....	23
	APPENDIX C – BUSHFIRE MITIGATION REGULATIONS CROSS REFERENCE TABLE .....	24
	APPENDIX D – LOY YANG B BOUNDARY & TRANSMISSION LINES .....	27

## STATION CONTACTS

<b>Operator</b>	LYB Operation & Maintenance Pty Ltd
<b>Site address</b>	Bartons Lane, Traralgon 3844
<b>Postal Address</b>	Locked Bag 2500 Traralgon 3844
<b>Contact Number</b>	(03) 5177 2000

<b>Person responsible for Plan preparation</b>	<b>Brendan Callahan</b>
<b>Position</b>	Electricity Safety Management Scheme (ESMS) Manager
<b>Site address</b>	Bartons Lane, Traralgon 3844
<b>Postal Address</b>	Locked Bag 2500 Traralgon 3844
<b>Telephone</b>	(03) 5177 2047
<b>Email</b>	brendan.callahan@loyyangb.com

<b>Person responsible for carrying out the Plan</b>	<b>Tony Hicks</b>
<b>Position</b>	General Manager, Loy Yang B Power Station
<b>Site address</b>	Bartons Lane, Traralgon 3844
<b>Postal Address</b>	Locked Bag 2500 Traralgon 3844
<b>Telephone</b>	(03) 5177 2001

<b>Emergency Contact Numbers for All Site Emergencies</b>	From an internal phone dial <b>3333</b> From mobiles/ External phones dial <b>(03) 5177 2111</b>
---	---

<b>Emergency Position.</b>	<b>Contact</b>	The Loy Yang B Power Station Shift Supervisor can be contacted 24 hours, 7 days a week throughout the year on <b>(03) 5177 2110</b>
----------------------------	----------------	---

<b>Copies of the Bush Fire Mitigation Plan</b>	Electronic copies of this plan are available through: 1. LYBs internal Quality Management System; and/ or 2. The Corporate website: <a href="https://www.loyyangb.com.au/environment-and-sustainability/">https://www.loyyangb.com.au/environment-and-sustainability/</a> Hard copies of the Plan are accessible during business hours, Tuesday to Friday 7:00am – 4:30pm, from: Loy Yang B Power Station Locked Bag 2500, Bartons Lane Traralgon, Victoria 3844  Or through a request in writing to the ESMS Manager.
--	---

## 1. Introduction

LYB Operations & Maintenance Pty Ltd (The Company) is the operator of the Loy Yang B Power Station (LYB) located on land 1.2 km east of AGL Loy Yang Power Station and approximately seven kilometres south west of the City of Traralgon. Access is via Bartons Lane from the Traralgon Creek Road or Hyland Highway. LYB consists of two electricity generating units which together provide up to 1,200MW of baseload power and supply approximately 20% of Victoria's energy needs. It has operated since 1993 and is one of the lowest cost and most reliable generators in the National Electricity Market (NEM).

The Power Station site aerial photo details the boundaries of Loy Yang B Power Station and High Voltage Overhead Lines (Refer to Appendix D). The whole of the site assets are located in a High Bushfire Risk Area (HBRA).

The Company maintains a high standard of risk management whilst achieving its primary role of electricity generation. It operates under certified standards for health and safety, environmental management and quality assurance and operates under an approved Gas Safety Case.

Bushfires pose a risk to business assets, electricity production, health, safety, and environment which have led to a set of control measures to mitigate the risk of bushfire. Furthermore, a well-trained response team and fixed reticulated and mobile fire suppression systems provide the resources to control bushfires within the LYB site boundary.

This bushfire mitigation plan has been developed in accordance with Loy Yang B Electricity Safety Management Scheme (ESMS) and implemented to manage the risks to assets (including HV lines) and personnel from bushfire and wild fire from and onto the LYB site.



Tony Hicks  
General Manager

### 2. Policy Statement

The Company is committed to managing the site to mitigate against the initiation and spread of fire and to protect at-risk electrical lines in compliance with the Electricity Safety Act and associated Bushfire Mitigation Regulations. This continues to be achieved by the application of various techniques including:

- periodic inspection,
- proactive operation and maintenance plans,
- monitoring of plant and surrounding environment,
- reporting of fires,
- quick response to the extinguishing of fires,
- provision and maintenance of firefighting systems, and
- assisting fire control agencies

### 3. Objective

The objective of the Bushfire Mitigation Plan (The Plan) is to make a provision for the mitigation of bushfires and wild fire from and onto the LYB site and risk minimisation for 'at-risk' electrical lines (HV lines).

The Plan provides an integrated set of procedures and instructions to lead a controlled reduction in fire risk to and from all site assets, through systems of asset inspection and management, fuel reduction, ignition source containment and fire control.

The specific objectives of the Plan are to:

- protect Loy Yang B Personnel, their contractors and the public engaged on the site
- fully comply with the Electricity Safety (Bushfire Mitigation) Regulations
- maintain a program of asset inspections consistent with the assessed level of risk
- operate and maintain the plant and facilities with controls to minimise the risk of initiation and or spread of fire
- manage vegetation fuel loads and asset clearances in a timely manner, for minimum fire risk, consistent with relevant standards and regulation; and
- assess performance of programs supporting this Plan and strive for continual improvement

Whilst the effective application of this Plan does lead to reduced fire risk, the risk is still finite. Consequently there remains a need to manage fire response and this is managed under the strategic framework of the sites incident management system, outlined in QMS.12 – All Hazards Management at Loy Yang B and accessible via LYBs Intranet.

### 4. Fire Hazard Rating

A Fire Hazard Rating assessment has been carried out by LYB authorised personnel and approved by the relevant management representatives.

The electrical assets covered in the Fire Hazard Rating assessment are as per the Loy Yang B ESMS scope of work, plant and equipment.

The Fire Hazard Rating is reviewed no later than three years plus one month from the date of the previous inspection or when a major change is made to the scope of the plant and systems covered by the Loy Yang B Electricity Safety Management Scheme.

The General Manager for LYB shall determine whether a major change has been made and advise the ESMS Manager to review the Rating and Risk Assessment.

The Bush Fire Mitigation Plan and Risk Assessment will be reviewed yearly to ensure currency and provide up to date data on the bushfire hazards and areas of risk for the site.

## **5. Scope of Electrical Systems**

The scope of electrical systems covered in this Plan are those same assets and systems covered by the Loy Yang B ESMS.

This includes:

- The Loy Yang B Brown Coal Power Station site including the generating units, their interconnecting elements to the Power Grid and the infrastructure services within the site.
- 500 KV Interconnection at the LYB generator transformer and switchyard.
- AGL Loy Yang to Loy Yang B 11KV station board interconnection tie overhead lines.
- LYB Power Station electrical machinery including generators, power supply distribution systems, motors, actuators and cabling.
- Workshops, Control Room and other Buildings.

These systems are defined in the attached site plan. The site plan forms a part of this Bushfire Mitigation Plan. (Appendix D)

### **5.1. Non Loy Yang B High Voltage Overhead Lines**

---

On the Loy Yang B site, there are overhead lines owned and managed by AusNet Services.

The AusNet Services overhead power lines are located on easements on the LYB site and are clearly marked on the site drawings. These lines are managed by AusNet Services and the management of these lines are included in their Bushfire Mitigation Plan; hence they are not included in the Loy Yang B Bushfire Mitigation Plan.

## **6. Preventative Strategies**

The preventative strategies to minimise the risk of the fire starting from onsite by electric lines of other sources on the Loy Yang B site are as follows:

- Completion and review of the LYB Fire Risk Assessment
- Mitigation strategies developed



- Management of the LYB HV overhead lines
- Manage the vegetation fuel reduction program prior and during the fire season
- Manage all hot works on the site
- Manage the specific requirements of hot works on days of total fire bans
- Maintain Fire Fighting equipment and reticulated water fire suppression system on site
- Maintain Site Emergency Response procedures
- Assist fire control agencies in the management and investigation of fires on site
- Manage and maintain an effective communication system
- Use trained and competent personnel to implement the bushfire mitigation plan
- Manage Fire Protection systems and water sources to effectively extinguish fires (Appendix B)

### 6.1. Fire Risk Assessment

---

A fire risk assessment of the electrical systems, plant, equipment and aerial lines was conducted by persons who have extensive experience on this type of plant and or fire prevention detection, fighting and control. The Risk Assessment is located in the risk management file on the LYB intranet.

The fire risk assessment will be reviewed yearly and recorded as such, or when a change in plant or site conditions requires a review to be completed.

#### 6.1.1 Scope

---

The scope of the risk assessment covered the following:

- Sources of fire ignition that could be caused by electrical energy, during normal operations, faults and maintenance activities, including external sources to site.
- Nature and extent of combustible material that could be ignited by such sources of ignition and the probability that ignition could occur.
- Influence of climatic and environmental conditions that are likely to occur during the declared fire danger period and days of total fire ban.
- Coverage and effectiveness of any fixed fire protection systems available.
- Emergency response capability, available on and off site.
- Probability of spread of fire to other plant items and/or off site areas.
- Consequences of a fire on-site, including personnel hazards, plant hazards and hazards to the upstream network.
- Identify risk mitigation strategies that will reduce the probability of occurrence of ignition from electrical assets, and/or the spread of fire appropriate to the identified risk. Such strategies include, preventative, contingent and recovery measures and processes, and includes the demands of declared fire danger periods and days of total fire ban.

Note: In the history of LYB Power Station, there has never been an incidence of any part of the electric line failing and potentially causing a fire. Additionally, there has never been a fire initiated by the at-risk electric line.

### **6.2. Mitigation Strategies**

---

Mitigation strategies developed are in line with design criteria of the Loy Yang B plant and equipment. Other measures outside of the design are included by the following: preventative measures, smoking control, housekeeping and maintenance, maintenance of fire protection equipment, aerial lines, hot work process control/cutting and welding, fire detection systems, firefighting and suppression, installed protection and detection systems and emergency response.

#### **6.2.1 Preventative measures**

---

Procedures, instructions, job plans and and hazard risk management plans have been developed to identify and wherever possible mitigate the possibility of emergency situations arising. Detailed first response guides are also available to effectively manage the major hazards likely to occur.

#### **6.2.2 Smoking control**

---

Smoking is prohibited on the LYB site with the exception of designated and defined "Smoking Areas". NO SMOKING signs delineate specific areas however in the main inside the boundary fence is a 'No Smoking' area.

#### **6.2.3 Housekeeping & Maintenance**

---

Preventative and predictive routine maintenance inspections are carried out on all designated plant including a monthly housekeeping inspection plan of the entire Loy Yang B site.

Outside consultants are used to conduct self-audits on safety procedures, operation methodologies and equipment maintenance.

### **6.3. Management of LYB Overhead Lines**

---

Preventative measures taken under the Plan, include equipment and aerial line inspections, plant inspections, provision of additional temporary fire prevention or fire control measures. Inspections of aerial lines and associated equipment are conducted by a person who has satisfactorily completed an approved Energy Safe Victoria training course, and who can demonstrate competency to carry out such inspections, to the satisfaction of Loy Yang B.

Demonstration of qualifications and competency is managed via internal procedures LYP0603 – Verification of Qualifications for Performing Tasks & LYP0421 – Contractor Management.

Inspections of all LYB aerial lines will be programmed 12 monthly via the LYB Maintenance Management System (MMS), where routine work orders are sent to the responsible LYB person to conduct and complete the inspections in accordance with appropriate Electric Line Clearance practices, as outlined under the Electricity Safety Act and Regulations.

Access to the Loy Yang Power Site for inspection of the 500 KV, 220 KV & 11KV aerial lines are provided for in the Loy Yang Infrastructure Services Agreement with AGL Loy Yang and Ausnet Services.

### **6.4. Management of LYB site Vegetation**

---

LYB routine inspections detail the annual management, review and implementation of fuel reduction works both approaching and during the fire season. LYB manages reviews and implements actions of site vegetation on a regular basis to ensure site conditions are maintained to adequately protect the site against wildfire attack. This includes wild fire protection by hazard vegetation removal external to the LYB site.

Fire hazard removal works include slashing, mulching and pruning. These works are assessed prior to each fire season, when a program is established and enacted. Regular inspections during progress of works are conducted to maintain hazard reduction priorities.

Inspections of LYB site vegetation will be completed yearly prior to the High Danger period via the LYB Maintenance Management System (MMS). Routine work orders are sent to the responsible LYB person to conduct and complete the inspections. All works will be completed to the appropriate Electric Line Clearance practices, as outlined under the Electricity Safety Act and Regulations.

Maintaining the clearance space required under electric line clearance codes and regulations will be carried out by appropriately authorised, trained and qualified persons. Contractors engaged in overhead line maintenance, installation, line clearance (both linesmen and vegetation control companies) must be licensed, trained and competent for the task. Contractors will be monitored and audited.

### **6.5. LYB Site Hot Works**

---

Loy Yang B Access to Plant procedures requires a Permit for any work being undertaken on the LYB site, with special requirements and precautions taken where Hot Work is being undertaken. Risk Assessments for all Hot Works is required to ensure precautions are comprehensively detailed to enable safe work conditions at all times.

All Hot Works on the site are managed according to the LYB Hot Works specific procedures. LYP0817 Fire Danger Period and Fire Trigger Response Plans & LYT0112 Hot Work, provides a methodology to allow for the safe undertaking of Hot Works on the LYB Site.

The Shift Supervisor advises all site personnel of any restrictions that may apply, including the non-issue of Hot Works permits. Restrictions for the issuing of Hot Works permits on day of total fire ban and internal fire alerts are controlled through this procedure.

### 6.6. High Fire Danger and Total Fire Ban Days

---

Loy Yang B has a standard Procedure in applying for Fire Rescue Victoria (FRV) Permits and Internal Permits to assess, approve and allow any Hot Works to be carried out. During days of **Total Fire Ban** only essential works will be undertaken under specific fire controls, and where possible, hot works are rescheduled or avoided.

LYB Hot Works specific procedures LYP0817 Fire Danger Period and Fire Trigger Response Plans, LYT0112 Hot Work and a FRV Permit defines the process for obtaining a total fire ban exemption for essential works. The relevant FRV Permit will be held on the LYB network and can be accessed from the quick links section on the Intranet Home Page.

FRV notify LYB by email of the declaration of a Total Fire Ban (TFB).

Recipients of all Access Permits must re-assess all hot works on days of TFB and if work is still necessary the existing Access Permit is cancelled and a specific Access Permit issued for the hot work.

Warning notices are displayed at the Main Entrance gate to Loy Yang B to inform all personnel of the TFB.

All Hot Work applications are assessed as to the criticality of the work to be performed outdoors before an Access Permit is issued.

All approved Hot Work site areas are inspected to ensure compliance with the FRV permits for use of open flames, welding, cutting and grinding during declared Fire Danger Periods.

Notification is then given to FRV regarding hot work being performed on days of Total Fire Ban.

Note: LYB do not disconnect the electric lines in the event of a fire, during Total Fire Ban days or during a Fire Danger Period. The at-risk electric line does not have a suppression protection system installed.

### 6.7. Maintenance of Fire Fighting Equipment

---

Regular maintenance routines have been established to ensure the servicing and maintenance of all Emergency Equipment is in accordance with AS1851 Routine Service of Fire Protection Systems and Equipment.

All LYB firefighting equipment is inspected on a regular basis. Routine inspections and testing of equipment is conducted and completed at predetermined frequencies. Routines are automatically produced and sent via LYB Maintenance Management System (MMS), where routine work orders are sent to the responsible LYB persons to conduct and complete the inspections in accordance with appropriate codes of practice, regulations or manufacturers requirements.

### 6.8. Site Emergency Response

---

QMS.12 (All Hazards Management at Loy Yang B Manual) has been developed to ensure a coordinated response to emergency control at LYB regardless of the nature of the emergency (Evacuation, Fire, Serious injury, Bomb threat, Chemicals, Spills, etc) or the source of emergency.

The Manual aims to provide a means that enables appropriate assistance to be sought from outside emergency services (Police, Fire Brigade, State Emergency Service and Ambulance) if required.

The Manual aims to:

- Limit the effect of the emergency on personnel, plant and the general environment
- Ensure the satisfactory communication of all vital information as soon as possible
- Facilitate a resumption of normal operations when appropriate
- Provide a basis for training personnel in the handling of emergency situations, and a system of emergency procedure review

In declaring an emergency the Shift Supervisor will assume the role of Loy Yang B Incident Controller and shall;

- Mobilise resources and commence efforts to overcome the emergency
- Appoint a Deputy Incident Controller to control the event at the scene
- Coordinate any evacuation and recording of personnel
- Coordinate initial notification of emergency services and the Manager – Production or their deputy
- Advise other Managers of the nature and extent of resources likely to be required
- Endeavour to make plant safe e.g. energy supplies, controlled areas
- Work in conjunction with any outside agency, who takes control of an incident on Loy Yang B's behalf

Where external Agency support is required, the LYB Incident Controller will become the 'Deputy Incident Controller' for the responding lead agency.

QMS.12 effectively assigns responsibilities and any actions required to personnel at all levels of the LYB workforce.

## 7. Training

All personnel are trained to perform the tasks detailed within this plan. The training of personnel is managed and recorded by LYB Training Coordinators. All personnel carrying out work on site are fully site inducted. The induction process states the minimum requirements for carrying out work on site, the need to report fires and provide firefighting assistance within their capabilities.

LYB have trained a large majority of our workforce in rescue and firefighting techniques as well as first aid. In the event of an incident requiring emergency response these people come together and an appropriate first response team is selected to respond, under the command of the LYB Incident Controller.

Any outbreak of fire requires the prompt response of well-trained and adequately equipped fire fighters with experienced leaders, effectively coordinated regardless of location or the asset threatened.

Loy Yang B employees undertake non-discretionary fire training as minimum on the commencement of employment and refreshed every 2 years. Training consists of fire appreciation, hose and foam techniques as well as extinguisher skills.

A higher level of training is provided to all Operational personnel every year. Training consists of fire appreciation, hose and foam techniques, extinguisher skills, use of breathing apparatus, rescue techniques and dangerous goods.

Advance Fire and Emergency Response training is offered to Emergency Response Team Personnel (ERT) and includes: advance fire techniques including high pressure natural gas, diesel and LPG, emergency response, emergency management and rescue techniques.

All LYB personnel and Contractors involved in the inspection and assessment of LYB owned aerial lines and associated equipment will be trained and have satisfactorily completed an approved Energy Safe Victoria training course.

## **8. External Agencies**

QMS.12 – All Hazards Management at Loy Yang B Manual defines the function and responsibilities of the incident management team and the interface between LYB personnel and emergency services and/or external agencies. Loy Yang B has adopted the same approach to managing incidents as used by Agency, to ensure the interoperability of all in responding to a significant incident on site. LYB provides assistance to fire control authorities, as required, including the investigation of fires on site.

LYB Power Station has access to firefighting & support services under a Mutual Aid agreement through the Central Gippsland Essential Industries Group, of which LYB is a member. This would enable activation of fire response assets from AGL Loy Yang, Energy Australia Yallourn or other member organisations as required.

## **9. Investigations**

An investigation will be initiated in the event of a fire involving LYB assets including HV electrical lines. The investigation will use the site's investigation procedure LYP0801 – Event Reporting, Recording and Investigation to identify the cause of the fire and the actions required to minimise further occurrences of the incident. All fires originating from LYB owned HV overhead Aerial Lines will be reported to Energy Safe Victoria via the Electricity Safety Management Scheme.

## **10. Communication of the Plan**

The General Manager Loy Yang B Power Station carries out promulgation and makes available for viewing of the Energy Safe Victoria's (ESV) accepted LYB Bushfire Mitigation Plan on the Corporate website.

## **11. Monitoring & Auditing**

The Bushfire Mitigation Plan will be monitored and audited on an annual basis. The audit will be initiated in May of every year by a work order in the site's computerised maintenance management system (MMS). The audit will include;

## **QMS.40 Bushfire Mitigation Plan**

---

- Monitor and audit the implementation of the bushfire mitigation plan
- Identify any deficiencies in the plan or the implementation
- Monitor and audit the effectiveness of inspections under the plan
- Improve on the plan and the plan's implementation
- Ensure all necessary training for the performance of the plan has been carried out
- Monitor and audit the competence of persons assigned to carry out the inspections

The audit will address the issues identified in clause 6(n) of the Electricity Safety (Bushfire Mitigation) Regulation. Any deficiencies found within the monitoring and auditing process will trigger an action, which will be remedied by establishing improvements to the plan. The revised bushfire mitigation plan will then be sent to Energy Safe Victoria.

## **12. Contingency Measures**

Contingency measures and procedures to manage periods of low, medium and high fire danger including total fire bans are in place and would typically include changes to operating and maintenance practices, staffing levels and the provision of additional external services including emergency response processes.

Specific contingency measures are as follows:

### **Low Fire Danger**

- Hot Work Risk Assessments
- Hot Work Firewatch as per the guidelines in LYT01 12-01 Hot Work Risk Assessment
- Request attendance on site of the LYB Emergency Response Team as required
- Request attendance on site of external Emergency Services as required
- Follow prescribed communications protocols when fire protection systems are out of service

### **Medium Fire Danger**

- Hot Work Risk Assessments
- Hot Work Firewatch as per the guidelines in LYT01 12-01 Hot Work Risk Assessment
- Request attendance on site of the LYB Emergency Response Team as required
- Request attendance on site of external Emergency Services as required
- Follow prescribed communications protocols when fire protection systems are out of service

### **High Fire Danger**

- Hot Work Risk Assessments
- Hot Work Firewatch as per the guidelines in LYT01 12-01 Hot Work Risk Assessment
- Request attendance on site of the LYB Emergency Response Team as required

## **QMS.40 Bushfire Mitigation Plan**

---

- Request attendance on site of external Emergency Services as required
- Follow prescribed communications protocols when fire protection systems are out of service
- Extra manning on site dedicated to “Fire Watch” on days of Total Fire Ban
- Mobilisation of the LYB Fire Trailer and Utility Slip-On Units to a strategic position on the LYB ring road
- Installation of fixed fire fighting equipment in higher risk areas
- Ability to declare “Station Total Fire Ban” if deemed necessary

### **Emergency Response**

- Protocols followed as outlined in **QMS.12 Volume 2 – Managing Emergencies:** and
- Protocols followed as outlined in **QMS.12 Volume 2.2 Hazard Response - Fire & Explosion**

## **13. References**

1. QMS.12 - All Hazards Management at Loy Yang B
  - Volume 1 – Managing Incidents
  - Volume 1.1 – Communication Response Plan
  - Volume 1.2 – Security Risk Management Plan
  - Volume 2 – Managing Emergencies
  - Volume 2.1 – Hazard Response Guidelines
2. Loy Yang B Maintenance Management System (MMS) Routines
  - LYB\_07 Yearly Reminder for Operations Manager to make an Application to the FRV
  - LYB\_60 Yearly inspection of all LYB overhead aerial lines, poles towers & equipment
  - LYB\_61 Review and Submit LYB Bushfire Mitigation Plan Yearly
  - LYB\_150 Yearly Pre Fire Danger Period Inspection of LYB Site Vegetation
  - LYB\_167 December Fire Danger Period Inspection of LYB Site Vegetation
  - LYB\_168 February Fire Danger Period Inspection of LYB Site Vegetation
  - LYB\_196 Post Fire Season Sprinkler Removal
  - LYB\_198 Pre Fire Danger Period Sprinkler Installation – LYB Tail End Rising Conveyor Area
  - LYB\_199 October Fire Danger Period Inspection of LYB Site Vegetation
  - LYB\_287 Fortnightly Checks On ERT Fire Trailer by ERT Members
  - LYB\_311 Hot Work Risk Assessment Checks - 3 Monthly
  - SCYE\_01 Vesda Cable Chamber Smoke Detectors Filter – 12 Monthly



## **QMS.40 Bushfire Mitigation Plan**

---

- SCYE\_02 Vesda Smoke Detector Head Change Over – 3 Yearly
- S\_SA25 Fire Dampers Routine Maintenance - Yearly
- SSG\_04 Monthly Fixed Fire Asset Routine Service
- SSG\_05 Annual Review of Fire Asset ITM Inventories
- SSGA\_02 Performance Testing of all F&GS Pumps - Yearly
- SSGA\_04 Fire & General Services - 2 Monthly Lubrication Routine
- SSGA\_05 Fire & General Service Lead Pumps 1, 2, and 3 - Monthly Lubrication Routine
- SSGA\_09 Diesel Fire Pump - 12 Monthly Diesel Inspection
- SSGA\_10 Diesel Fire Pump - 3 Monthly Routine
- SSGA\_11 Diesel Fire Pump - 2 Yearly Diesel Routine
- SSGA\_14 F&GS Pumps Service – 5 Yearly Routine
- SSGA\_16 Engage FRV to carry out Fire Protection Advice Audit – 5 Yearly
- SSGA\_20 6 Monthly Portable F&GS Diesel Pump Routine
- SQJC\_04 Monthly H2 Storage Compound Deluge System Flush
- AECD\_11 Deluge of Line 1 Rising Conveyor – Monthly (Saturday)
- AECD\_15 Deluge of Line 2 Rising Conveyor – Monthly (Saturday)

All test results & reports relating to maintenance of the Fire Protection System are located in the LYB network drive: Z:\Plant Filing System - Non KKS\Fire protection system

3. Loy Yang B Plant Maintenance Manuals and Operation Manuals
4. Electricity Safety Management Scheme (ESMS) Manual – [QMS.04](#)
5. Loy Yang B Procedures & Instructions

[LYP0120 - Access to Plant](#)

[LYT0121 - Permit Access](#)

[LYP0603 – Verification of Qualifications for Performing Tasks](#)

[LYP0421 – Contractor Management](#)

[LYP0801 - Event Reporting, Recording and Investigation](#)

[LYP0806 - Fire Prevention](#)

[LYP0809 – Fire Protection Unavailability Reporting](#)

[LYP0817 - Fire Danger Period & Fire Trigger Response Plans](#)

[LYT0112 - Hot Work](#)

[LYT0112-01 - Hot Work Risk Assessment](#)

## **14. Appendices**

### **Appendix A – Risk Assessment Considerations**

---

Fire emergencies may occur in any part of the site as a result of internal or external actions or events. There are a variety of areas within the site that would be sensitive to a fire emergency. These areas have been identified as part of this assessment. The aim is in the prevention and spread of fire to other parts of the plant. All areas of concerned have fixed or portable firefighting equipment available to them.

#### **1. Loy Yang B 500 KV Switchyard and Transformers**

---

The Loy Yang B 20/500KV Generator, 20/11KV Unit, 11/3.3KV Unit and excitation transformers, (Units 1 and 2) present a fire risk due to the oil in the transformers and high voltages present. Fixed water deluge systems are used to protect these areas.

#### **2. Electrical High and Low Voltage Switch, Control equipment rooms and cable chambers**

---

Very Early Smoke Detection Apparatus (VESDA) smoke detector units and heat sensing detectors are located throughout all switch and control equipment rooms, alarming to the Fire Indicator Panel (FIP) in the control room. Firefighting equipment includes manual fixed water deluge systems, hydrants, extinguishers and foam making systems and equipment.

#### **3. Brown Coal Distribution System (Rising Conveyor & Storage)**

---

Two identical conveyor lines designed to deliver brown coal of 2800 tonne/hr each supplies the stations sixteen brown coal storage silos having a total capacity of 6400 tonnes. (400 tonne per silo). Hot work procedures apply at all times. Fixed water deluge systems are used for protection. Other firefighting equipment includes hydrants, hoses and foam making systems and equipment.

#### **4. Hydrogen Storage Areas**

---

The hydrogen required for generator cooling is housed adjacent to Unit 1 Cooling Tower and consists of a 2600 cubic metre trailer. The hydrogen storage area is open to atmosphere with a fixed water deluge system used for protection. Hot work procedures apply at all times.

#### **5. Natural Gas Pipeline and Distribution Supply**

---

Loy Yang B's natural gas supply pipeline commences at Barrs Road at the gas compound at Flynn. The high-pressure pipeline enters LYB on the North/East corner of the LYB ring road. The high-pressure gas is reduced and heated through the gas reception area, consisting of water bath heaters and pressure reduction valve compound. Appropriate remote control and manual shut off isolation valves and gas leakage detection devices are installed and tested regularly. Hot work procedures apply at all times. Firefighting equipment includes hydrants, hoses and extinguishers.

### **6. Oxygen Storage**

---

Located in storage enclosure outside of Turbine basement West side of station. Firefighting equipment includes hydrants, hoses and extinguishers.

### **7. Loy Yang B Flammable Liquid Store**

---

Loy Yang B flammable liquid store is on the South West corner of the Unit 1 Turbine House. 200 litre and 20 litre drums of flammable liquids and oils are stored in the bunded area of the building. Heat detection and alarm equipment is installed in this area.

Firefighting equipment includes hydrants, hoses and foam making systems and equipment.

### **8. Loy Yang B Chemical Plant**

---

Located in a storage enclosure at the Western end of the Turbine house basement. Firefighting equipment includes hydrants, hoses and extinguishers and containment barriers.

### **9. Warehouse Flammable Liquid Store**

---

Loy Yang B Warehouse flammable liquid store is located on the South West corner of the Loy Yang B Warehouse/Training facility area. 200 litre and 20 litre drums of flammable liquids and oils are stored in a bunded building which has its own triple interceptor pit. Heat detection and alarm equipment is installed in this area. Firefighting equipment includes hydrants, hoses and foam making systems and extinguishers.

### **10. Return Water and Ash Disposal Pipelines**

---

Loy Yang B return water supply and ash disposal pipelines enters the LYB site from the adjacent AGL Loy Yang Ash Pond Dam. The ash disposal pipelines commence at LYB ash handling area on the Western end of the boiler house and runs in concrete plumes to the ash inlet area of the Ash Pond. The return water pipeline commences at the AGL Loy Yang Outfall pumping station to the LYB ash handling area on the Western end of the boiler house. Inspections of the pipelines are completed weekly and have remote control and manual shut off isolation valves. Hot work procedures apply at all times. Firefighting equipment includes; LYB fire trailer, a 300L Slip-On Unit, two 750L Slip-On Units, portable fire equipment, extinguishers, knapsacks, hydrants, hoses and foam making systems.

### **11. Workshops**

---

Smoke and Heat detectors.

Firefighting equipment includes hydrants, hoses and extinguishers.

### **12. LYB Unit Control Room (UCR)**

---

Very Early Smoke Detection Apparatus (VESDA) smoke detector units are located throughout the control room, alarming onto the fire indicator panel.

Firefighting equipment includes hydrants, hoses and extinguishers.

### **13. Risk Assessment Documentation**

---

Risk assessment documentation is held in the stations computer network QA risk assessments.

### **14. Exemptions**

---

Loy Yang B Power Station does not have any exemptions issued by ESV from the Electricity Safety (Bushfire Mitigation) Regulations.

## **Appendix B – Fire Protection Systems**

---

### **1. Fire Detection and Alarm Systems.**

---

Fire Detection and alarm systems are installed to protect plant and equipment at LYB. The range of equipment includes heat sensing wire, thermal sensing devices and smoke detection.

There are a multitude of fire alarms, all connected to the Fire Indicator Boards (FIBs) located in the Unit Control Rooms – the Unit Control Rooms are themselves supervised by smoke detectors.

All activated fire alarms are personally investigated, prior to alerting FRV.

Very Early Smoke Detection Alarm (VESDA) systems have been located in high-risk areas around the site including the Unit Control Room, Control Equipment Rooms, Station Cable Chambers, Computer/VAX room, Station Coal Bunker Transfer and storage and the Station Simulator facility.

### **2. Water Supplies**

---

Low Quality Water (LQW) and High Quality Water (HQW) supplies are fed from the AGL Loy Yang Power Station.

#### **2.1 Low Quality Water (LQW)**

The LQW water is pumped from the Latrobe River at Yallourn and transferred via a closed, single pipeline to a high-level storage reservoir (earth fill wall with 6,000 mega-litre capacity) – the annual allocation is 20 Giga litres. This reservoir provides a 30 day buffer supply for the cooling tower make-up water as well as general power station requirements at AGL Loy Yang & Loy Yang B power station.

The LQW is fed to the two power stations via two pipelines (100% redundancy provided), which are completely buried and physically separated by 5 to 8 metres.

LQW can be fed directly to the Fire and General Services (F&GS) Pumps or it can be sourced directly from the cooling tower basins, each basin has a capacity of 12 ML.

There are five F&GS pumps:

- #1 Lead Pump (Electric) - Nominal rating 80-175l/sec @ 106m.
- #2 Lead Pump (Electric) - Nominal rating 80-175l/sec @ 106m
- #3 Lead Pump (Electric) - Nominal rating 80l/sec @ 106m
- Main Pump (Electric) - Nominal rating 75-300l/sec @ 146m
- Main Diesel Pump - Nominal rating 300l/sec @ 146m.

One of the three lead pumps run continuously with all other pumps set to auto start as the system pressures and flow dictates.

The fire and general service water (F&GS) is delivered to the power station at 1.8MPa and supplies areas above the eighth floor.

The F&GS water also passes through a pressure reducing station, which reduces the pressure to 1MPa. This supplies areas below the eighth floor.

- Automatic sprinkler systems,
- Automatic deluge systems,
- Fire hydrants and hose reels, and
- Washing down purposes.

There is an alternative emergency F&GS supply, fed to the rising coal conveyors area from the AGL Loy Yang mine.

### 2.2 High Quality Water System

HQW is derived from the Moondarra Reservoir, which is fed from the Tyers River. Gippsland Water provide supply of HQW to a storage reservoir near the Loy Yang complex and then via gravity to the inlet of a primary treatment plant operated by AGL Loy Yang.

Treated HQW water for the AGL & LYB power stations is stored in two 15 mega-litre concrete lined tanks.

The two tanks are situated in an elevated position – the water is gravity fed to the batter limits of both AGL & LYB power stations.

### 3. Water Mains, Hydrants and Hose Reels

---

The 64mm hydrants, and small bore 19mm live hose reels are fed from either, the fire and general service reticulation system via several ring mains, or by the HQW reticulation system, all of which have sufficient isolating valves to ensure that at least 75% of the service is active at all times. In general, those ground level water hydrants and hose reels external to the power station structure are supplied by HQW and those at elevated levels and within the power station structure are supplied from the F&GS System.

An average distance of 60 metres physically separates the hydrant and hose reel outlets. Foam solution and application equipment is on hand and can be manually connected.

### 4. Fire Sprinkler Systems

---

#### 4.1 Control Centre Building

A wet type, automatic sprinkler system protects the entire multi-storied Control Centre Building (apart from the Unit Control Room). The design is in accordance with AS 2118 – Automatic Fire Sprinkler Systems.

#### 4.2 Cable Chambers

The cable chambers are protected by a manually operated sprinkler system.

#### 4.3 Automatic Deluge Protection (Coal Conveyors)

The rising coal conveyors are protected by automatic deluge systems in the following areas:

- Above the coal belt
- In between the coal belt, and return belt, and
- Below the return belt.

The system is divided into zones with each zone approximately 30 metres long. Activation is via a small pipe pressurized with F&GS water, equipped with conventional (68 C rating) sprinkler heads.

The system is designed to the AS 2118 and National Fire Protection Association (NFPA) Codes from the USA.

#### 4.4 Automatic Deluge Systems (Turbine Lubricating Oil System)

The turbine lubricating oil system is protected by automatic deluge systems similar to those described above.

The oil storage tank/pumping facility is protected by a multi-jet control (MJC) automatic deluge system. The room is of non-combustible construction with a concrete spillage control compound (bund). Any spillage flows to an oil separation facility prior to water subsequently flowing to settling ponds.

#### 4.5 Automatic Deluge Systems (Unit & Generator Transformer)

Both the unit transformers and generator transformers are protected by automatic, twin pipe deluge systems designed to AS 2118 or NFPA code.

The large spillage control compound for the generator transformers is also covered by the deluge system. Any spillage flows to an oil separation facility prior to water subsequently flowing to settling ponds.

A reinforced concrete explosion wall separates the two transformers; the Unit transformer is fire/explosion isolated from the Turbine/Generator house by a reinforced concrete wall.

### 5. Watchman Services

---

LYB operates 24 hours, 7 days a week throughout the year and has LYB employees on site at all times.

### 6. Fire Extinguishers & Other Protection.

---

#### 6.1 Automatic carbon dioxide gas flooding systems.

Automatic carbon dioxide gas flooding systems are installed in the following areas:

- System data rooms (these rooms are annexed off the Unit Control Room)
- In the acoustic enclosure for the fire and general service (F&GS) diesel pump and emergency diesel generators.

#### 6.2 Fire Extinguishers.

LYB ensures adequate numbers and types of extinguishers are located and easily identified throughout the Station. Fire extinguishers are maintained and managed on site by fire protection contractors with equipment repaired or replaced as needed.

#### 6.3 LYB Fire Trailer & Utility Slip-On Units

LYB has one fire trailer and three Slip-On Units that will be mounted in the tubs of key utility vehicles – one is 350 litre capacity and two are 750 litre capacity located on site. These assets allows access to remote areas around the site where no water supplies are available and can be used to assist other agencies as required. LYB has staff specially trained to manage and operate this equipment and provides the ability to respond to a fire from multiple points.

#### 6.4 Public Fire Brigade

Traralgon Fire Rescue Victoria (Fire Station 77) is a fully staffed fire station and is situated approx. 15kms away – the normal response time is approx. 10 – 12 minutes.

The Duty Officer and several appliances will attend the power station if the fire is serious; up to 14 appliances can attend including units from Dandenong (100kms away).

**Table 1 - Line (feeder) Denomination**

---

	Voltage (kV)	Number of Spans	Length (m)	Insulated (Y/N)	Number of Poles	Pole Material	Year of Construction
LYA – LYB 11KV FEEDER A	11KV	10	535	N	11	Concrete	1990
LYA – LYB 11KV FEEDER B	11KV	10	535	N	11	Concrete	1990

Appendix C – Bushfire Mitigation Regulations Cross Reference Table

Reg No.	LYB Reference	LYB Responsible	LYB Process	When	How
6 (a) the name, address and telephone number of the specified operator	QMS.40 LYB Bushfire Mitigation Plan – Page 5	ESMS Manager	Maximo Routine LYB_61 – Review & Submit LYB Bushfire Mitigation Plan (Yearly)	June every year	Scheduled via Maintenance Management System (MMS) - Maximo
6 (b) the position, address and telephone number of the person who was responsible for the preparation of the plan	QMS.40 LYB Bushfire Mitigation Plan – Page 5	ESMS Manager	Maximo Routine LYB_61 – Review & Submit LYB Bushfire Mitigation Plan (Yearly)	June every year	Scheduled via MMS
6 (c) the position, address and telephone number of the persons who are responsible for carrying out the plan	QMS.40 LYB Bushfire Mitigation Plan – Page 5	ESMS Manager	Maximo Routine LYB_61 – Review & Submit LYB Bushfire Mitigation Plan (Yearly)	June every year	Scheduled via MMS
6 (d) the telephone number of the specified operator's control room so that persons in the room can be contacted in an emergency that requires action by the specified operator to mitigate the danger of bushfire	QMS.40 LYB Bushfire Mitigation Plan – Page 5	ESMS Manager	Maximo Routine LYB_61 – Review & Submit LYB Bushfire Mitigation Plan (Yearly)	June every year	Scheduled via MMS
6 (e) the bushfire mitigation policy of the specified operator to minimise the risk of fire ignition from its at-risk electric lines	QMS.40 LYB Bushfire Mitigation Plan – Page 7, Section 2	ESMS Manager	Maximo Routine LYB_61 – Review & Submit LYB Bushfire Mitigation Plan (Yearly)	June every year	Scheduled via MMS
6 (f) the objectives of the plan to achieve the mitigation of fire danger arising from the specified operator's at-risk electric lines	QMS.40 LYB Bushfire Mitigation Plan – Page 7, Section 3	ESMS Manager	Maximo Routine LYB_61 – Review & Submit LYB Bushfire Mitigation Plan (Yearly)	June every year	Scheduled via MMS
6 (g) a description, map or plan of the land to which the bushfire mitigation plan applies, identifying the location of the specified operator's at-risk electric lines	QMS.40 LYB Bushfire Mitigation Plan – Page 27, Appendix D	ESMS Manager	Maximo Routine LYB_61 – Review & Submit LYB Bushfire Mitigation Plan (Yearly)	June every year	Scheduled via MMS
6 (h) the preventative strategies and programs to be adopted by the specified operator to minimise the risk of the specified operator's at-risk electric lines starting fires	QMS.40 LYB Bushfire Mitigation Plan – Page 8, Section 6	Manager, Engineering & Maintenance	Maximo Routine LYB_60 – Yearly Inspection of all LYB Overhead Lines, Poles, Towers & Equipment	March every year	Scheduled via MMS
6 (i) a plan for inspection that ensures that all of the specified operator's at-risk electric lines are inspected at regular intervals of no longer than 37 months	QMS.40 LYB Bushfire Mitigation Plan – Page 10, Section 6.3	Manager, Engineering & Maintenance	Maximo Routine LYB_60 – Yearly Inspection of all LYB Overhead Lines, Poles, Towers & Equipment	March every year	Scheduled via MMS
6 (j) details of the processes and procedures for ensuring that each person who is assigned to carry out the inspections referred to in paragraph (i) has satisfactorily completed a training course approved by Energy Safe Victoria and is competent to carry out such inspections	QMS.40 LYB Bushfire Mitigation Plan – Page 10, Section 6.3	Maintenance Team Leader or Contract Supervisor	Procedure LYP0603 – Verification of Qualifications for Performing Tasks Procedure LYP0421 – Contractor Management	March every year	Qualifications verified by LYB Responsible Person prior to assigning task – as per the Procedure
6 (k) details of the processes and procedures for ensuring that persons (other than persons referred to in paragraph (j)) who carry out or will carry out functions under the plan are competent to do so	QMS.40 LYB Bushfire Mitigation Plan – Page 10, Section 6.3	Maintenance Team Leader or Contract Supervisor	Procedure LYP0603 – Verification of Qualifications for Performing Tasks Procedure LYP0421 – Contractor Management	March every year	Qualifications verified by LYB Responsible Person prior to assigning task – as per the Procedure
6 (l) (i) the operation and maintenance plans for the specified operator's at-risk electric lines — <i>in the event of a fire</i>	QMS.40 LYB Bushfire Mitigation Plan – Page 12, Section 6.8	Production Shift Supervisor	QMS.12 All Hazards Management – Volume 2.2	As required	Incident report initiated – Emergency Phone No: 3333



**QMS.40 Bushfire Mitigation Plan**

Reg No.	LYB Reference	LYB Responsible	LYB Process	When	How
6 (l) (ii) the operation and maintenance plans for the specified operator's at-risk electric lines — <i>during a total fire ban day</i>	QMS.40 LYB Bushfire Mitigation Plan – Page 12, Section 6.8	Production Shift Supervisor	Procedure LYP0817 – Fire Danger Period & Fire Trigger Response Plans	Prescribed Total Fire Ban Days	FRV notification to LYB via Shift Supervisor landline or mobile phone
6 (l) (iii) the operation and maintenance plans for the specified operator's at-risk electric lines — <i>during a fire danger period</i>	QMS.40 LYB Bushfire Mitigation Plan – Page 12, Section 6.8	Manager, Engineering & Maintenance	Procedure LYP0817 – Fire Danger Period & Fire Trigger Response Plans Maximo Routine LYB_07 – Yearly FRV Permit Application	October every year	FRV Permit applied for & hard copy held in Shift Supervisor office
6 (m) the investigations, analysis and methodology to be adopted by the specified operator for the mitigation of the risk of fire ignition from its at-risk electric lines	QMS.40 LYB Bushfire Mitigation Plan – Page 14, Section 9	General Manager	Procedure LYP0801 – Event Reporting, Recording and Investigations Work Instruction LYT0801 – Incident Investigations	As required	Incident report initiated via supervision lines
6 (n) (i) details of the processes and procedures by which the specified operator will— <i>monitor the implementation of the bushfire mitigation plan</i>	QMS.40 LYB Bushfire Mitigation Plan – Page 14, Section 11	ESMS Manager  Manager, Engineering & Maintenance	Maximo Routine LYB_61 – Review & Submit LYB Bushfire Mitigation Plan (Yearly)  Maximo Routine LYB_150 – Yearly Pre Fire Danger Period Inspection of LYB Site Vegetation	June every year  October every year	Scheduled via MMS  Scheduled via MMS
6 (n) (ii) details of the processes and procedures by which the specified operator will— <i>audit the implementation of the plan</i>	QMS.40 LYB Bushfire Mitigation Plan – Page 14, Section 11	ESMS Manager  Senior Business Compliance Officer	Maximo Routine LYB_61 – Review & Submit LYB Bushfire Mitigation Plan (Yearly)  Procedure LYP1602 – Audit Procedure for Internal & External Audits	June every year  When scheduled via Quality Assurance program	Scheduled via MMS  Scheduled via MMS
6 (n) (iii) details of the processes and procedures by which the specified operator will— <i>identify any deficiencies in the plan or the plan's implementation</i>	QMS.40 LYB Bushfire Mitigation Plan – Page 14, Section 11	ESMS Manager  Senior Business Compliance Officer	Maximo Routine LYB_61 – Review & Submit LYB Bushfire Mitigation Plan (Yearly)  Procedure LYP1602 – Audit Procedure for Internal & External Audits	June every year  When scheduled via Quality Assurance program	Scheduled via MMS  Scheduled via MMS
6 (n) (iv) details of the processes and procedures by which the specified operator will— <i>change the plan and the plan's implementation to rectify any deficiencies identified under subparagraph (iii)</i>	QMS.40 LYB Bushfire Mitigation Plan – Page 14, Section 11	ESMS Manager  Senior Business Compliance Officer	Maximo Routine LYB_61 – Review & Submit LYB Bushfire Mitigation Plan (Yearly)  Procedure LYP1602 – Audit Procedure for Internal & External Audits	June every year  When scheduled via Quality Assurance program	Scheduled via MMS
6 (n) (v) details of the processes and procedures by which the specified operator will— <i>monitor the effectiveness of inspections carried out under the plan</i>	QMS.40 LYB Bushfire Mitigation Plan – Page 14, Section 11	ESMS Manager	Maximo Routine LYB_60 – Yearly Inspection of all LYB Overhead Lines, Poles, Towers & Equipment	March every year	Scheduled via MMS

**QMS.40 Bushfire Mitigation Plan**

Reg No.	LYB Reference	LYB Responsible	LYB Process	When	How
6 (n) (vi) details of the processes and procedures by which the specified operator will— <i>audit the effectiveness of inspections carried out under the plan</i>	QMS.40 LYB Bushfire Mitigation Plan – Page 14, Section 11	ESMS Manager	Maximo Routine LYB_60 – Yearly Inspection of all LYB Overhead Lines, Poles, Towers & Equipment	March every year	Scheduled via MMS
6 (o) the policy of the specified operator in relation to the assistance to be provided to fire control authorities in the investigation of fires near the specified operator's at-risk electric lines	QMS.40 LYB Bushfire Mitigation Plan – Page 14, Section 8	Production Shift Supervisor	LYB Stakeholder Contact list	As required	Contact by outside agency

For access to this drawing, please apply in writing.