# **Solicitation**

# Katmai National Park & Preserve

# **Limited Commercial Use Authorization (CUA)**

Shuttle and Water Taxi Service

PROSPECTUS ISSUED: November 27, 2023

PROPOSALS DUE: December 31, 2023

The National Park Service has issued a Prospectus soliciting proposals for a limited CUA to operate a shuttle and water taxi within Katmai National Park.

The terms of this CUA are described in the Prospectus.

Proposals must be <u>received</u> by the National Park Service no later than 5:00 P.M. AKST of the due date listed above. Send proposals electronically to:

Ginger Irvine R11 CUA Program Manager AKRO\_CUA\_Admin@nps.gov

To request the Prospectus Package electronically or in hardcopy, contact:

Cinnamon Dockham, Commercial Services Specialist Cinnamon dockham@nps.gov

The National Park Service is conducting this solicitation in accordance with 54 U.S.C § 101925 (PL 105-391 Sec 418 (2(A)), Commercial Services Guide Chapter 11.10 Limiting CUAs and ANILCA Section 1307.

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# PROPOSAL INSTRUCTIONS

Limited Commercial Use Authorization (CUA)

Proposal to operate Shuttle and Water Taxi services within Katmai National Park

The National Park Service is conducting this solicitation in accordance with 54 U.S.C. § 101925 (PL 105-391 Sec 418(2 (A)), Commercial Services Guide Chapter 11.10 Limiting CUAs and ANILCA Section 1307.

## PROPOSAL INSTRUCTIONS

## Response Requirements for Submission of Proposal

- 1. Proposals for the Katmai National Park & Preserve Limited Commercial Use Authorization to operate a Shuttle and Water Taxi must be received by 5:00 P.M AKST on December 31, 2023.
- 2. Only an Offeror submitting a responsive proposal is eligible to be selected for the CUA.
- A responsive proposal means a timely submitted proposal that is determined by the Service as agreeing to all of the minimum requirements of the CUA conditions and stipulations.

## Form in Which Proposal Must be Submitted

- 1. Offerors must follow the format provided in the Proposal Package.
- 2. Responses to selection questions 1, 3 and 4 collectively must not exceed five (5) pages.
- 3. Your response to question 2 is not limited. Please use as many pages as you need to create your Draft Risk Management Program (RMP) document. The NPS standards for the RMP and a sample RMP are included as Exhibit 1 and Exhibit 2.
- 4. Please number each page and include a heading identifying the selection question to which you are responding.

#### **Submission Protocol**

- 1. Submit your responses to the Selection Questions.
- Submit your completed CUA Application Form 10-550. CUA Application Forms and instructions can found on the Alaska Commercial Services website at:
   <a href="https://www.nps.gov/locations/alaska/commercial-authorizations.htm">https://www.nps.gov/locations/alaska/commercial-authorizations.htm</a>. Write in Water Taxi and Shuttle as activity type.
- 3. Submit the ANILCA Form (Addendum 1) if applicable.
- 4. Submit all required forms electronically to:

Ginger Irvine
R11 CUA Program Manager
AKRO\_CUA\_Admin@nps.gov
Subject: Limited CUA Proposal Submission

5. If you are unable to submit these documents electronically, please contact KATM's Concessions Management Specialist, Cinnamon Dockham, at <a href="mainto:cinnamon\_dockham@nps.gov">cinnamon\_dockham@nps.gov</a> for instructions on a hard copy submittal.

## **Evaluation Process and Rating Criteria**

If more than one Offeror submits a proposal, the following evaluation process will apply.

The NPS will convene an evaluation panel, consisting of National Park Service staff, to evaluate and rate submissions. Proposals will be evaluated and rated based on applicant response to the selection questions. There are four (4) questions with a total of one-hundred (100) points possible. The applicant with the highest rating will be offered the CUA.

The NPS will select the best applicant response under the following rating criteria:

- 1. Resource Protection (25 points)
- 2. Visitor Safety (25 Points)
- 3. Level of Service (25 Points)
- 4. Relevant Experience (25 Points)

## **Questions**

If you do not understand something in this Prospectus, you must submit your questions via email to Cinnamon Dockham at cinnamon\_dockham@nps.gov.

#### **EXHIBT A**

#### RISK MANAGEMENT PROGRAM STANDARDS

#### **PURPOSE**

These standards define NPS minimum requirements for concessioner Risk Management Programs (RMPs) in accordance with NPS policy. The RMP is the management system the concessioner develops and implements to address the risk management aspects of its operations. Concessioners are independently responsible for developing and implementing an RMP of adequate scope and content to comply with all Applicable Laws and to provide for a safe and healthy environment for employees and visitors, irrespective of these RMP standards.

#### **AUTHORITIES**

NPS Management Polices (section 10.2.4.8) states that concessioners are responsible for managing all their operations to minimize risk and control loss due to accident, illness, or injury, and that concession contracts must contain requirements for each concessioner to develop a RMP that is (1) appropriate in scope to the size and nature of the operation, (2) in accord with the Occupational Safety and Health Act of 1970 and the NPS concession risk management program, and (3) accepted by the superintendent.

#### STANDARDS DEVELOPMENT AND UPDATE

The standards were developed in consideration of Applicable Laws, industry safety management standards (such as BS OHSAS 18001), NPS risk management and Operational Leadership policy and guidance, past NPS concession RMP policy and standards, and concessioner risk management practices. This standard will be periodically reviewed and may be revised to reflect changes in Applicable Laws, industry practices, or to provide program improvements.

#### **RMP STANDARDS**

The RMP standards defined by the NPS consist of the requirements associated with ten elements, identified in Table 1 below. While the RMP must address each of these elements, it should be specific to, and adequately address, the type and size of services the concessioner provides under its concession contract with the NPS. The RMP can, and should, be simple and flexible to ensure it is fully embraced and implemented by the concessioner's management and staff. More complex operations and services, or additional park requirements to prepare for specific events, may warrant a more detailed program with additional elements or sub-elements than those defined through the NPS standard.

Table 1 - NPS Concession RMP Elements

1	Risk Management Program Scope	6	Reporting
2	Responsibility and Accountability	7	Inspections and Corrective Action
3	Training	8	Hazard Incident Investigations and Abatement
4	Documentation and Operational Controls	9	Management Review
5	Communication	10	Other Contract Requirements

## RMP Element 1 –Risk Management Program Scope

The concessioner must establish and maintain an RMP appropriate for the activities, size, and complexity of the operation.

#### Standards:

- 1.1 The RMP is documented, and its scope covers the ten risk management elements. Furthermore, the RMP scope addresses the risk management objectives and aspects applicable to the operation, including:
  - legal requirements (Applicable Laws), contract requirements (including requirements contained in Exhibits), and safety best management practices
  - employee and visitor hazards
  - operational, facility and natural hazards
- 1.2 The RMP establishes a safety policy for the organization. The policy indicates commitment to:
  - compliance with Applicable Laws and safety and health-related contract requirements
  - providing a safe and healthful environment for employees, park staff and visitors to the extent possible
  - assigning responsibilities
  - providing staff and resources
  - monitoring performance

## RMP Element 2 – Responsibility and Accountability

The concessioner must establish the organizational structure, personnel roles and responsibilities, and resources needed to effectively implement the RMP.

#### Standards:

- 2.1 The concessioner identifies a safety and health official, and documents this assignment in the RMP.
- 2.2 The concessioner identifies the risk management organizational and staff responsibilities, and documents this structure and assignments in the RMP.
- 2.3 RMP resources are developed, documented in the RMP, and applied; resources are adequate to execute the program. Resources include:
  - personnel (e.g., number of staff, experience and skills)
  - facilities and equipment
  - information, documentation, and data management systems
  - agreements for support from outside contractors and agencies
  - training programs for concession personnel

## RMP Element 3 – Training and Qualifications

Personnel must be competent to perform the tasks assigned to implement the RMP.

- 3.1 Managers and staff with safety and health responsibilities meet the qualification requirements defined in the contract and RMP. Competency requirements are defined by appropriate education, training, and experience.
- 3.2 A training plan is developed, documented in the RMP, and executed; and includes:
  - Defined training requirements for the safety officer and other personnel, including requirements to meet Applicable Laws, the contract, and the RMP.
  - Required training records, such as training materials, schedules, and participant records.
- 3.3. The concessioner has conducted and documented all training.

#### RMP Element 4 – Documentation and Operational Controls

The concessioner must establish and maintain plans and procedures to manage operations and emergencies associated with its RMP. The number and complexity of these plans and procedures will depend on the size and complexity of the concessions operation. Some plans and procedures may be required by Applicable Law or the contract.

#### Standards:

- 4.1 RMP plans and standard operating procedures are developed, implemented, maintained, and included or referenced in the RMP. These plans and procedures address requirements in Applicable Laws, the contract, and the RMP to ensure safe operations. Some plans and procedures may overlap with those in the Environmental Management Program (EMP) and/or the Public Health Program (PHP). Examples of operating procedures include:
  - Procedures for the safe storage and handling of chemicals
  - Procedures for embarking and disembarking visitors
  - Procedures for safe equipment use, maintenance, and inspection
  - Procedures for managing wildlife interactions
  - Procedures for animal pest exclusion
  - Procedures for cancelling operations due to weather
- 4.2 RMP emergency plans and procedures are developed, documented (if applicable), implemented, maintained, and included or referenced in the RMP. These plans and procedures address requirements in Applicable Laws (e.g., Emergency Action Plan (EAP), Fire Prevention Plan (FPP), the contract, and the RMP. Some plans and procedures may overlap with those in the EMP and/or PHP. Emergencies to be addressed include:
  - Natural disasters (earthquakes, floods, tornados, hurricanes, etc.)
  - Motor vehicle incidents
  - Medical emergencies (visitors and employees)
  - Fire (structural, motor vehicles, wildfires, etc.)
  - Terrorism and law enforcement activities
  - Accidents and fatalities (visitors and employees within park boundaries)

#### **RMP Element 5 - Communication**

The RMP must be effectively communicated internally to concession employees, and externally to park personnel, visitors, and to other parties that could be involved in the RMP.

#### Standards:

- 5.1 The RMP is available to staff and communicated throughout the concession organization so that personnel understand and can effectively implement the RMP.
- 5.2 The RMP addresses procedures for communicating hazards to visitors. The hazards may include:
  - Activity-related hazards (e.g., white water rafting)
  - Natural resource-related hazards (e.g., bears)
  - Facility-related hazards and procedures (e.g., property evacuation maps)
- 5.3 Any visitor acknowledgment of risk is approved by the park. Waivers of liability are not used.
- 5.4 The concessioner's risk emergency plans are coordinated and agreements in place with other applicable parties such as the NPS, other federal, state, or local emergency response agencies.

#### RMP Element 6 - Reporting

As part of its RMP, the concessioner must develop and implement procedures for reporting internally within the concession organization, and externally to the park and other regulatory agencies.

#### Standards:

- 6.1 All documents, reports, monitoring data, manifests, notices and other documentation required to be submitted to regulatory agencies are submitted on time and in accordance with Applicable Laws. Copies of such communications are provided to the NPS in accordance with the contract. Additional plans, reports, and other documentation are submitted to the NPS in accordance with the contract and RMP.
- 6.2 Imminent danger and serious incidents are reported to the park in a timely manner in accordance with the contract and RMP.
- 6.3 Annual reports include internal, park, and other regulatory agency risk data, and are submitted to the NPS in accordance with the contract and RMP.

## RMP Element 7 – Inspections and Corrective Action

Concessioners must develop and implement safety inspection processes to identify risk management issues. Inspections must be conducted by persons trained and capable of recognizing and evaluating the applicable aspects of the operation. Inspections may be conducted for the concessioner by a qualified third party. Concessioners must also develop and implement a process for abating deficiencies identified through their inspection processes or by any regulatory agency.

#### Standards:

- 7.1 Safety inspections are conducted as required by Applicable Laws, specified in the contract and RMP, or as otherwise necessary to effectively manage operations safely. Formal and routine inspections are scheduled, conducted, and documented. The inspections are conducted by qualified personnel as described in the RMP.
- 7.2 Imminent danger, serious, and non-serious hazard deficiencies identified by internal or external inspections are analyzed, corrected, or mitigated within the contract or RMP required timeframes. Any deviations from these timeframes are accepted by the park and documented.

## RMP Element 8 – Emergency Incident Investigation and Abatement

Concessioners must develop and implement procedures to address accidents/incidents as part of its RMP.

## Standards:

- 8.1 Accidents/incidents are responded to in a timely and effective manner.
- 8.2 An investigation is conducted for every accident/incident.
  - The investigation includes an analysis to determine the cause.
  - Corrective action is taken to mitigate recurrences of the accident/incident.

## RMP Element 9 – Management Review

Concessioners must conduct a management review of the RMP at least annually to ensure its continued suitability, adequacy, and effectiveness. This review should consider performance against internal indicators such as health and safety goals and objectives. The review must also consider program failures that occurred during the year. The RMP must be modified to reflect any necessary changes to address any program gaps required.

#### Standards:

- 9.1 The RMP is reviewed at least annually, and updated as necessary.
  - The RMP review includes analysis of performance in each RMP element area to determine any systemic program failures (particularly failures that resulted in fatal or serious accidents/incidents or imminent danger hazard deficiencies) and non-compliance with Applicable Laws.
  - Systemic problems are addressed in RMP updates.
- 9.2 The initial RMP is submitted to the park within the contract specified timeframe for review, and is accepted by the park. Any subsequent documented RMP updates are submitted to the park for review and acceptance.

## RMP Element 10 - Other Contract Requirements

In addition to the requirements outlined for other RMP elements, the concession contract may have additional risk management requirements in the contract, operating, or maintenance plans that are *de facto* standards.

10.1 Contract-specific safety and health requirements not otherwise addressed in the RMP standards are met.

#### **DEFINITIONS**

**Applicable Laws:** The laws of Congress governing the Area, including, but not limited to, the rules, regulations, requirements and policies promulgated under those laws (e.g., 36 CFR Part 51), whether now in force, or amended, enacted or promulgated in the future, including, without limitation, federal, state and local laws, rules, regulations, requirements and policies governing nondiscrimination, protection of the environment and protection of public health and safety.

**Concession Contract:** A binding written agreement between the NPS Director and a concessioner entered into under 36 CFR 51. It authorizes concessioners to provide certain visitor services within a park under specified terms and conditions. All NPS concessioners awarded concessions contracts that are based on the standard concession contract provisions published in the Federal Register on May 4, 2000 (65 FR 26051-26086: Part III, Department of the Interior, National Park Service, Standard Concession Contract; Revision; Notice), are required under Section 4 of the standard concession contract to prepare and submit an initial written RMP to the park within 60 days of the effective date of their concession contract for acceptance.

**Deficiencies**: Deficiencies are classified into one of three categories.

- Imminent danger: A condition or practice with potential for loss of life or body part, permanent disability, and/or extensive loss of structure, equipment or material.
- Serious hazard: A condition or practice with potential for serious injury or illness resulting in temporary disability or property damage that is disruptive, but less severe than imminent danger.
- Non-serious hazard: A condition or practice with potential for minor non-disability injury or illness or non-disruptive property damage.

**Emergency Action Plan (EAP)**: Emergency plan required under 29CFR 1910.38(a) to ensure visitor and employee safety. EAP emergencies include:

- Natural disasters (earthquakes, floods, tornados, hurricanes, etc.)
- Motor vehicle incidents
- Medical emergencies (visitors and employees)
- Fire (structural, motor vehicles, wildfires, etc.)

- Terrorism and law enforcement activities
- Accidents and fatalities (visitors and employees within park boundaries)
- Hazardous spills or releases

Fire Prevention Plan (FPP): Fire prevention plan required under 29CFR 1910.39 to address fire safety.

**Incident**: Incidents which must be reported to the park include:

- Fatalities
- Visitor incidents which could result in a tort claim against the United States
- Property damage incidents over \$500
- Employee injuries requiring more than first aid treatment
- Any fire
- Motor vehicle accidents over \$250
- Others as defined in the contract

**Timely:** The period of time reasonable under the circumstances. Corrective action for deficiencies is completed within the maximum time limits:

Imminent danger: immediately
Serious hazard: 15 days
Non-serious hazard: 45 days

## **RESOURCES** (available soon on SharePoint)

For more detailed guidance on the Risk Management Program, please refer to the following:

RM 48 Chapter 5: Contract Management

RM 48 Chapter 6: Concession Review Program

RMP Guidance RMP Example

## Exhibit B

## NPS CONCESSION RISK MANAGEMENT PROGRAM SAMPLE

#### **PURPOSE**

This document has been prepared as an educational and resource tool for National Park Service (NPS) concessioners to assist them in developing and administering a documented Risk Management Program (RMP) in accordance with their concession contract and RMP standards for National Park Service Concessioners.

This RMP sample is for a fictitious SCUBA diving concession operating under a Category II contract in a fictitious park. Black text highlights each RMP elements as defined in the NPS standards. Example RMP text and tables are marked in blue.

#### NOTICE

This RMP is a sample only. The sample information provided is for illustration only and any may not be accurate or complete. It does not constitute a complete reference to Federal, State or local laws, regulations or ordinance or policy requirements. Relaying on the information contained in this sample does not guarantee contractual compliance or protect a concessioner legally. Concessioners are independently responsible for developing an own RMP appropriate to their operation and that meets all legal requirements contractual requirements and provides for the safe operation of the concession.

#### RMP ELEMENT 1 – RISK MANAGEMENT PROGRAM SCOPE

The concessioner must establish and maintain an RMP appropriate for the activities, size, and complexity of the operation.

**Risk Management Program Scope.** This documented Risk Management Program (RMP) is developed in accordance with the Wonder Water Dives (WWD) concession contract with the National Park Service (NPS) (CCWOWA004-16), specifically Operating Plan Section 6.2. The RMP complies with NPS RMP standards.

WWD is committed complying with applicable laws and regulations and NPS risk management standards and contract requirements and to the extent reasonably possible, providing safe operations for WWD employees, customers, NPS employees, and others. This RMP describes the program that WWD has established to meet these commitments.

#### RMP ELEMENT 2 - RESPONSIBILITY AND ACCOUNTABILITY

The concessioner must establish the organizational structure, personnel roles and responsibilities, and resources needed to effectively implement the RMP.

**RMP Responsibilities.** The General Manager (GM) of WWD is the designated Safety Officer. The GM is responsible for overall development, implementation, and monitoring of this RMP. All WWD employees are responsible for complying with applicable laws and regulations, NPS requirements and company policies and procedures.

In addition to these general responsibilities, the GM is also responsible for all land-side operations including gear maintenance and tank filling practices. On the water, boat captains are responsible for crew and client safety. Dive masters are responsible for safe SCUBA practices in the water. Table 1 lists specific assignments.

Table 1 – WWD Safety Assignments				
Personnel Area		Description		
		RMP development and Implementation		
GM (Safety Officer)	Office	Regulatory Reporting		
Sandy Shore	Office	Land-side Gear maintenance		
		Compressor - Tank filling		
	Office	Docking		
Boat Captain		Vessel Operation		
Tug Shipman	Vessel	Mooring		
		Dive entries & exits		
Dive Masters Bob Diver Dive		Diving		
		Securing Equipment (e.g., tanks & weights)		
Cindy Seaworthy	Dock Assisting passengers & gear on and off vessel			

All employees are held accountable to ensure everyone follows safe and compliant practices. Performance relative to their safety responsibilities is a part of each employee's annual review. In addition, the GM is responsible for the results of the NPS RMP evaluation.

## RMP Element 3 – Training and Qualifications

Personnel must be competent to perform the tasks assigned to implement the RMP.

**Training and Qualifications**. Wonder Water Dives has the following certification and training requirements to ensure safe operations:

Table 2 – WWD Safety Training and Qualifications					
Personnel Description Frequency					
Training:					
All staff RMP awareness		Annual			
	Safety Chats	Monthly			
	Emergency plans	Annual			
Applicable Staff	Standard Operating Procedures	Annual			
Certifications:					
Boat Captain	USCG captain's license	Renewed annually			
Dive Masters	DM or higher certification	Nationally recognized certifying agency			
	Gas blender certification	Renewed 5 years			
	Oxygen administration certification	Renewed 2 years			
	First Aid	Renewed 2 years			
Clients	Open Water Diver or higher	Nationally recognized certifying agency			

Certifications are tracked copies are maintained in the WWD Office. Training logs are completed to track WWD participation. These logs are filed in the WWD office.

## RMP Element 4 – Documentation and Operational Controls

The concessioner must establish and maintain plans and procedures to manage operations and emergencies associated with its RMP. The number and complexity of these plans and procedures will depend on the size and complexity of the concessions operation. Some plans and procedures may be required by Applicable Law or the contract.

## Documentation and Operational Controls. This RMP is developed and maintained by GM.

WWD also has documented standard operating procedures (SOPs) and emergency plans to ensure safe operations. SOPs are listed in Table 3; emergency plans are listed in Table 4. The SOPs and emergency plans are developed and updated by the GM as necessary in collaboration with applicable WWD personnel. The SOPs and emergency plans are maintained in the applicable WWD safety file on board each vessel and in the office with master hardcopies and electronic versions in the WWD GM's office. SOPs and emergency plans are dated to ensure currency.

Other RMP documentation includes: personnel certification and training records; regulatory reports; inspection logs and corrective action reports; accident investigation and corrective action reports; vessel registration, radio licenses, and other RMP-related correspondence. These are maintained by the GM in the WWD office as well as on-board vessels as applicable.

Table 3 – WWD Safety Standard Operating Procedures					
Area	Title/Description	Version Date	Responsibility		
	Getting on and off the boat from land		Captain/mate/dive staff		
	Getting on and off the boat at sea – entry and exit procedures while wearing SCUBA gear		Captain/mate/dive staff		
Vessel:	Dive flag protocols		Captain/mate/dive staff		
	Anchoring, mooring & docking		Captain		
	Boat maintenance (see also EMP)		Captain/mate		
	Captain's logs		Captain		
	Dive brief – includes safety equipment, no dive gloves or spear fishing, buddy system, underwater safety signals, wildlife interactions		Dive staff		
Dive:	Client Health/Seasickness/First Aid		Dive staff/mate		
	Securing tanks & weights		Dive staff/mate		
	Tank filling		GM/dive staff		
	SCUBA gear maintenance		Dive staff		

Table 4 – WWD Emergency Plans				
Area	Title/Description	Responsibility		
General	Hurricane		GM	
General	Emergency Action		GM	
	Vessel Fire Response		Captain/GM	
	Vessel Sinking/Abandon Ship		Captain/GM	
Vessel:	Unexpected weather		Captain/GM/NPS	
	Hurricane		GM/NPS	
	Fuel Spill Response		GM/Captain/mate	
Diver	SCUBA incident		Dive staff/captain	
Dive:	Wildlife accident		Dive staff/captain	
Office/	Building Evacuation		GM	
Dock:	Fire Prevention		GM	

#### **RMP ELEMENT 5 - COMMUNICATION**

The RMP must be effectively communicated internally to concession employees, and externally to park personnel, visitors, and to other parties that could be involved in the RMP.

**RMP Communication.** The RMP is available to staff in the GM's office. Employees are briefed on the RMP and associated SOPs and emergency plans thorough annual and monthly training programs.

Electronic copies of the RMP are provided to WOWA Concessions who provide them to the Chief Ranger's Office and Park Dispatch. The GM briefs WOWA Concession personnel annually regarding the WWD RMP during the annual RMP evaluation as well as during other check-in meetings.

RMP topics covering vessel, dive and natural hazards are communicated to visitors by boat (captain or mate) and dive briefs (dive staff). Visitors also sign a NPS-approved Acknowledgement of Risk form.

### **RMP ELEMENT 6 - REPORTING**

As part of its RMP, the concessioner must develop and implement procedures for reporting internally within the concession organization, and externally to the park and other regulatory agencies.

**RMP Reporting.** WWD internal RMP reporting will be completed by the GM with information provided by captains and dive staff as appropriate. WWD will complete all required reports to regulatory agencies, NPS contract stipulated reports including the annual RMP, and any imminent danger or serious incident investigation reports. Table 5 lists key WWD safety reports.

Table 5 – WWD RMP Reports							
Report	Recipient	Reporter	Frequency	Copy to NPS			
External Reports							
Certificate of Vessel inspection	USCG	GM/Captain	Annual	Yes			
OSHA 301 Forms	OSHA	GM	Each Reportable Injury/Illness	No			
OSHA 300 Form	OSHA	GM	Annual	No			
OSHA 300A Form	OSHA	GM	Annual	Yes			
Imminent Danger Serious Accident Reports	NPS	GM	As they Occur	Yes			
RMP	NPS	GM	Initial and Annual	Yes			
Other Regulatory Agency Reports	Applicable Agency	GM	As they Occur	Yes			
Internal Reports							
Dive accidents	WWD	GM	As they Occur	Yes			

#### RMP ELEMENT 7 – INSPECTIONS AND CORRECTIVE ACTION

Concessioners must develop and implement safety inspection processes to identify risk management issues. Inspections must be conducted by persons trained and capable of recognizing and evaluating the applicable aspects of the operation. Inspections may be conducted for the concessioner by a qualified third party. Concessioners must also develop and implement a process for abating deficiencies identified through their inspection processes or by any regulatory agency.

**Inspections and Corrective Action**. WWD has instituted an internal inspection program to ensure compliance with regulations and a safe environment. Inspection schedules are maintained to ensure inspections are conducted as required and include frequency, inspector's name, findings, and date completed. Daily visual inspections of the vessel, SCUBA gear and tanks will not be recorded unless deficiencies are found.

Deficiencies are raked based on their severity as imminently dangerous, serious, and minor. Deficiencies are recorded and are reported to the GM. Imminently dangerous and serious deficiencies must be reported to the GM immediately. All deficiencies corrected as soon as possible. The GM will set corrective action timeframes. Imminently dangerous and serious deficiencies may require that operations be shut down until the issue is corrected.

The WWD equipment, facilities and operations are also subject to external inspections. These include USCG vessel inspections, NPS periodic inspections and dive tank inspection for certification.

Table 6 below lists the key WWD internal and external inspections.

Table 6 – WWD Safety Inspections						
Inspection	Inspector	Frequency	Requirements	Documentation		
External Inspections						
Vessel inspection	USGS	Annual	USGS	USGS Report		
Periodic Operational Performance Inspection	NPS	Semi- annual	10-DIV (NPS)	Periodic Inspection Report		
RMP Evaluation	NPS	Annual	10-RMP	RMP Evaluation Report		
Fire Extinguisher Hydrostatic Testing	Contractor	Annual	NFPA	Receipt and Extinguisher Tags		
Office Fire Suppression System Test	Contractor	Annual	NFPA	Report		
Vessel Fire Suppression System Test	Contractor	Annual	NFPA	Report		
SCUBA Tank Hydrostatic Test	Contractor	Every 5 yrs.	DOT	Receipt; tank stamp		
Internal Inspections						
Vessel (Daily) (See also EMP)	Mate	Daily	Internal Checksheet	Deficiency Record; Inspection Log		
Vessel (Monthly)	Captain	Monthly	Internal Checksheet	Completed Check Sheet		
Dive Equipment (Daily)	Dive Master	Daily	Internal Checksheet	Deficiency Record Inspection Log		
Dive Equipment (Monthly)	Dive Master	Monthly	Internal Checksheet	Completed Check Sheet; Inspection Logs		

Table 6 – WWD Safety Inspections (Cont.)				
Inspection	Inspector	Frequency	Requirements	Documentation
SCUBA Tank Visual	Dive Master	Annual	DOT	Tank Sticker; Inspection Log
Compressor	Dive Master	Monthly	Internal Checksheet	Deficiency Record Inspection Log
Office (See also EMP)	GM	Monthly	Internal Checksheet	Deficiency Record Inspection Log
Dock (See also EMP)	Captain	Daily	Internal Checksheet	Deficiency Record Inspection Log

#### RMP ELEMENT 8 – EMERGENCY INCIDENT INVESTIGATION AND ABATEMENT

Concessioners must develop and implement procedures to address accidents/incidents as part of its RMP.

**Emergency Incident Investigation and Correction**. All emergency incidents such major vessel or dive equipment failures or accidents, and all client or employee injuries are reported to the GM.

Incidents are investigated and abatement based on timeframes that consider the issue and its severity. At minimum, all incidents are reviewed by the GM and Captain.

WWD classifies incidents based upon their severity as defined in NPS standards. Serious incidents are reported to the park and serious incident investigations are conducted in coordination with the NPS.

#### RMP ELEMENT 9 – MANAGEMENT REVIEW

Concessioners must conduct a management review of the RMP at least annually to ensure its continued suitability, adequacy, and effectiveness. This review should consider performance against internal indicators such as health and safety goals and objectives. The review must also consider program failures that occurred during the year. The RMP must be modified to reflect any necessary changes to address any program gaps required.

Management Review. WWD is committed to maintaining and improving its RMP.

The GM annual reviews the RMP to ensure that it is current, that the RMP and associated procedures are effective and that any annual objectives for improvement were met. Included in this review is an analysis of internal and external inspection results, incident reports, WWD procedural changes, and other input.

The GM makes any necessary changes to the RMP based on this analysis and submits the updated RMP to the park for review and acceptance. The GM also updates and SOPs or Emergency Plans to reflect necessary improvements or changes.

The GM orients staff on the updated RMP and SOPs and Emergency Plans through the WWD training program.

## RMP ELEMENT 10 – OTHER CONTRACT REQUIREMENTS

In addition to the requirements outlined for other RMP elements, the concession contract may have additional risk management requirements in the contract, operating, or maintenance plans that are *de facto* standards.

**Other Requirements.** Wonder Water Dives is a member of Divers Alert Network as required in the contract.

## **RMP ATTACHMENTS**

The concessioner may opt to attach documentation such as training logs, SOPs and emergency plans, inspection forms and reports to the RMP.