



**Pacific Gas and
Electric Company**

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August 28, 2024

Mr. Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: General Order (G.O.) 112-F Compliance Inspection of Pacific Gas and Electric's
Pipeline Construction and Material Traceability Audit

Dear Mr. Eng:

Pacific Gas and Electric Company (PG&E) submits this response to the Safety and Enforcement Division's (SED) Post-Inspection Summary of Inspection Findings (Summary) received July 29, 2024, stemming from the SED inspection of PG&E's Pipeline Construction and Material Traceability records, conducted June 3 to 7 and June 10 to 14, 2024.

For clarity, each of the items identified in the Summary will be repeated, followed by PG&E's response.

Concern #1:

Issue Summary

1. During records review, SED noted that PG&E did not document pipeline weld completion dates on the following construction packages: R985, R1075, R1316, R1795, R687, and R888. Although PG&E explained that the pipeline welding dates are written on the buried pipeline, SED is concerned that this process does not completely capture the entire pipeline welding process to ensure Traceable, Verifiable and Complete records. SED recommends that PG&E begin documenting the pipeline welding dates on its weld map and weld procedure records to ensure traceable, verifiable and complete records.

Response to Concern #1:

PG&E disagrees with this finding. The weld completion dates for the projects indicated were all documented in accordance with the requirements of the Daily Field Weld Summary Report (DFWSR), TD-4160P-60-JA01 (see Attachment 1). The "Report Completion Date" states to "Record month, day, and year (mm/dd/yyyy) in which the DFWSR was fully completed" (see Figure 1 below).

<div style="display: inline-block; vertical-align: middle; margin-left: 10px;"> Daily Field Weld Summary Report Instructions </div>		TD-4160P-60-JA01 Publication Date: 03/17/2021 Effective Date: 06/17/2021 Rev. 3b
Project ID: 1	Location: 3	Inspector Name, ID: 5
Order Number: 2	Line Number: 4	Report Completion Date: 6

Project Information	
1 Project ID	Record project ID (workstream-specific ID) if available. Otherwise record NA. Examples: R-421, T-1245, V-512
2 Order Number	Record project order number (8-digit number associated with project billing, e.g., 41856481, 30954865). If the project has multiple order numbers, provide the order number that coincides with the installation location.
3 Project Location	Record project site location. Examples: city, mile post marker, designated dig location, or station facility
4 Line Number	Record the pipe's line number. Examples: L-109, DFM-0820-01
5 Inspector Name, ID	Record full name of qualified welding inspector who inspects the welds and completes a daily field weld summary report (DFWSR). Provide PG&E LAN ID or contractor ID. Examples: PG&E: Bob Jones, J5JM; contractor: Dennis Klein, F210
6 Report Completion Date	Record month, day, and year (mm/dd/yyyy) in which the DFWSR was fully completed.

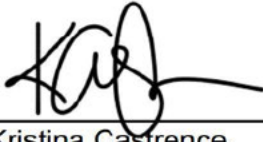
Figure 1. TD-4160P-60-JA01, rev 3b

It has been the intent of this form that a weld is not complete until all the procedural requirements are met, whether that weld requires a final visual inspection, magnetic particle testing (MT), or radiographic testing (RT or X-ray). The weld is not fully completed until the date all required weld inspection has been accepted. The reason for using the "fully completed" status on the DFWSR is to have a control in place that indicates the weld has met all inspection requirements prior to releasing a weld into the system or for hydrostatic testing. This is considered conservative from a compliance perspective, as using a later date representing when the weld is "fully completed" would create more opportunity for qualification lapses if the welder was near his welder qualification renewal date.

Provided as Attachments 2-7 are copies of the Daily Field Weld Summary Reports related to construction packages: R985, R1075, R1316, R1795, R687, and S888.

Please contact [REDACTED] for any questions you may have regarding this response.

Sincerely,



Kristina Castrence
Sr. Director, Gas Regulatory and Risk
Gas Engineering

cc: Claudia Almengor, CPUC
Matthewson Epuna, CPUC
Dennis Lee, CPUC
Nicholas Peno, CPUC
[REDACTED], PG&E
[REDACTED], PG&E

Attachments:

Attachment 1 – TD-4160P-60-JA01.pdf
Attachment 2 – R-985_DFWSR.pdf
Attachment 3 – R-1075_DFWSR.pdf
Attachment 4 – R-1316_DFWSR.pdf
Attachment 5 – R-1795_DFWSR.pdf
Attachment 6 – R-687_DFWSR.pdf
Attachment 7 – S-888_DFWSR.pdf