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January 15, 2025

Mr. Dennis Lee, P.E.
Program and Project Supervisor
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 Gas Inspection of Pacific Gas and Electric's Sacramento Division

Dear Mr. Lee:

Pacific Gas and Electric Company (PG&E) submits this response to the Safety and Enforcement Division's (SED) Post-Inspection Written Preliminary Findings (Summary) received December 17, 2024, stemming from the SED inspection of PG&E's Sacramento Division conducted October 21 through November 1, 2024.

SED's Summary noted two concerns that were discovered during the inspection. For clarity, each of the concerns identified in the Summary will be repeated, followed by PG&E's response.

Concern #1: Design and Construction: Design of Pipe Components (DC.DPC)

Question Title, ID	Flanges and Flange Accessories, DC.DPC.FLANGE.O
Question	2. Do flanges and flange accessories meet the requirements of 192.147?
References	192.141 (192.147(a), 192.147(b), 192.147(c))
Assets Covered	Sacramento Division (85399 (13))
Issue Summary	SED conducted field inspections at regulator station A-37 near Kirkby Way and Gilman Way in North Highlands on 10/29/2024 and found multiple flanges with stud bolts that did not extend completely through the nut. Title 49, Code of Regulations (49 CFR) §192.147(a) states, "Each flange or flange accessory (other than cast iron) must meet the minimum requirements of ASME/ANSI B 16.5 and MSS SP-44 (incorporated by reference, see §192.7), or the equivalent." American Society of Mechanical Engineers (ASME) / American National Standards Institute (ANSI) B 16.5, section 6.10.2 states, "6.10.2 Bolt Lengths. Stud bolt lengths, including the height of two heavy hexagon nuts, are shown as dimension L in Tables 7, 10, 13, 15, 17, 19, and 21 (Tables F7, F10, F13, F15, F17, F19, and F21 of Annex F). The tabulated stud bolt length L does not include the height of end points. An end point is defined as an unthreaded length, such as a chamfer, which extends beyond the thread. The method of calculating bolt lengths is explained in Annex D. The tabulated bolt lengths are reference dimensions. Users may select other bolting lengths." ASME B16.5-2003 Annex D requires that bolt length be calculated to include the length of the necessary nuts needed to connect the flange, plus the minimum flange thickness, plus the gasket thickness, plus the appropriate thickness tolerances. Additionally, PG&E Gas Design Standard B-45.4: Flange Bolt-Tightening Sequence and Torque Values, section 2.1(E) states, "Bolts/studs must be fully engaged and extend completely through the nut, with a recommended minimum of one thread exposed. Any

excess thread protruding beyond the nut face should be minimized with a recommendation, not to exceed ½ beyond nut face."

PG&E has initiated a system-wide self-report for the bolt thread engagement issue with Corrective Action Program (CAP) #126221073 created on 5/24/23. The bolt thread engagement issue was also included on the Q2 Internal Review Summary of Findings (IRSF) report which was submitted to SED on 7/13/23. PG&E also created a work order for corrective action to be done on regulator station DR-B43 on the same date.

SED requests that PG&E send verification that regulator stations sites DR-B43 and A-37 have been included into the existing program.

Response to Concern #1:

PG&E agrees with this concern as it relates to Regulator Station A-37. Regulator Station A-37 was visited on October 27, 2024 by the SED inspectors. Multiple flanges were found to have insufficient thread engagement. Regulator Station A-37 has been added to Corrective Action Program (CAP) #126221073. PM #46443017 has been created to address the thread engagement issue. PG&E anticipates completing this task in Q1 of 2025.

PG&E respectfully disagrees with this concern as it relates to Regulator Station DR-B43. There is no such station in the Sacramento Division. Subsequent to the inspection, PG&E Regulatory Compliance personnel and the SED lead for the 2024 Sacramento Division's Inspection discussed the issue and agreed that this concern is incorrect since Regulator Station DR-B43 does not apply to the Sacramento Division. As such, the concern for Regulator Station DR-B43 should be dismissed.

Concern #2: Time Dependent Threats: External Corrosion – CP Monitoring (TD.CPMONITOR)

Question Title, ID	Cathodic Protection Monitoring Criteria, TD.CPMONITOR.MONITORCRITERIA.O
Question	3. Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?
References	192.465(a) (192.463(b), 192.463(c), 192.463(a))
Assets Covered	Sacramento Division (85399 (13))
Issue Summary	During the field portion of this inspection, SED observed a number of pipe-to-soil potential reads that did not meet PG&E's acceptance criteria. Deficiencies were discovered at the following equipment numbers: Isolated steel risers: 42653741: -897 mV 45203141: -450 mV ETS: 42024380: -684 mV 42014024: -684 mV 44393822: -792 mV 42017801: -847 mV Prior to the end of the inspection, PG&E provided a list of corrective notifications for each of the deficiencies identified above. Please inform SED of the corrective actions taken.

Response to Concern #2:

PG&E agrees with this concern. As SED mentions, corrective notifications for each of the equipment numbers referenced have been created. Remediation will occur in accordance with §192.465 External corrosion control: Monitoring and remediation, (d) which states "*Remedial action must be completed promptly, but no later than the earliest of the following: prior to the next inspection or test interval required by this section; within 1 year, not to exceed 15 months, of the inspection or test that identified the deficiency; or as soon as practicable, not to exceed 6 months, after obtaining any necessary permits.*"

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
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