

**PUBLIC UTILITIES COMMISSION**505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

October 1, 2024

GI-2024-04-SWG-30-22

Mr. Kevin Lang  
Vice President, Engineering  
Southwest Gas Corporation  
5241 Spring Mountain Road  
Las Vegas, NV 89193-8510

**Subject: General Order (G.O.) 112-F Compliance Inspection of Southwest Gas Company's Material Traceability Program**

Dear Mr. Lang:

The Safety Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112-F inspection of Southwest Gas Company's (SWG) Material Traceability Program on April 8 thru 12, 2024. SED staff reviewed SWG's written procedures and reviewed project documentation pursuant to G.O. 112-F, Reference Title 49, Code of Federal Regulations (CFR), Parts 192. The inspection review period included SWG's records from the Pipeline Safety Enhancement Program work that was performed in 2015.

SED staff had four concerns which are described in the enclosed "Summary of Inspection Findings". Please provide a written response within 30 days of receipt of this letter indicating any updates or corrective actions taken by SWG to address the concerns.

If you have any questions, please contact Michelle Wei, at (213) 620-2780 or by email: [miw@cpuc.ca.gov](mailto:miw@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Terence Eng".

Terence Eng, P.E.  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

CC: Michelle Wei, SED/GSRB  
Laurie Brown, SWG  
Kan Wai Tong, SED/GSRB  
Claudia Almengor, SED/GSRB

# Summary of Inspection Findings

## Concerns:

1. During its records review, SED noted that SWG did not document the heat numbers for valves and elbows that were installed in all the projects SED reviewed. The full list of projects can be found in Attachment A. For example, SWG did not document the mill test reports for the pipe with heat number T50497A used in a bore. SWG stated that this documentation was not required to be maintained on distribution projects. There is no specific requirement in the 49 CFR Part 192 for documentation of material heat numbers for non-transmission pipes. However, 49 CFR Part 192 Section 192.1007(a)(5) states: “Provide for the capture and retention of data on any new pipeline installed. The data must include, at a minimum, the location where the new pipeline is installed and the material of which it is constructed.” SED recommends that SWG ensures that they document any data that is relevant to the material properties of pipes or fittings for high pressure distribution pipeline projects.
2. During its review of the welding records, SED noted that SWG allowed the welders to inspect their own welds. SED is concerned that this practice of allowing a welder to inspect his/her own welding work product lacks objectivity, accountability, and does not inspire confidence in the result of the welding inspection report.
3. During the inspection, SED and SWG discussed SWG’s QA/QC process for construction project completion and consolidation. SED also reviewed a sample project checklist, and the list of tasks required for completion in their Work Management system. However, SWG does not have a written procedure that details the QA/QC process and what documentation needs to be retained. SWG stated that the checklist is not retained as part of the project records. SED recommends that SWG develop a written process/procedure and add the checklist to the project records for retention, demonstrating that the QA/QC process was followed and completed.
4. During review of the construction weld maps, SED was unable to readily locate the welding procedure used for any of the welds we looked at during record review. SED reviewed all the welds for each project listed in Attachment A. SWG later provided the welding inspector’s notes that documented the welding procedures used. SWG informed SED that the welding inspector’s notes are not maintained as part of the construction closeout package. SED recommends that SWG review its pipeline construction project close-out documentation and retention procedure to ensure that all information that describes how the weld was created, and by whom, is documented and retained for the life of the pipeline.

# **Attachment A: List of Projects Reviewed**

- WR#1413183 - SIMP/HP/AMARGOSA RD (PALMDALE RD TO DOS PALMAS RD)
- WR#1413384 - SIMP/HP/I-15 CROSSING (DOS PALMAS RD TO YATES RD)
- WR#1446060 - SIMP/HP/AMARGOSA RD (SENECA RD TO PALMDALE RD)
- WR#1516353 - SIMP/HP/AMARGOSA RD (MOJAVE DR TO SENECA RD)
- WR#1521075 - SIMP/HP/GASLINE RD (SEALS RD TO VICTORVILLE TAP B)