

2016 Yosemite Division CPUC Audit Responses

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Finding Type [Internal, NOV, AOC]	Finding #	Finding	Response	Associated Attachment (File Name)
NOV - PG&E's Internal Review Findings		At the start of the inspection, PG&E provided SED its findings from the internal review it conducted of the Division. Some of PG&E's internal review findings are violations of PG&E's standards, and are therefore violations of Title 49 Code of Federal Regulations (CFR), §192.605(a). SED is aware that PG&E corrected all of its findings prior to SED's inspection. Table 1 lists all of the violations from PG&E's internal review.	All corrective actions within the Internal inspection findings for the Yosemite Division CPUC audit have been completed.	N/A
NOV	1	1. Title 49 CFR §192.605(a) states: "General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response."	Please see below.	N/A
NOV	1 (i)	PG&E Procedure TD-4430P-04-F02 requires all plug valves to be lubricated during annual maintenance. SED found during record review two transmission plug valves that were inspected but not lubricated in 2015: <ul style="list-style-type: none"> • Line 118A, Valve V-A • Line 118A, RA-22, Valve V-1 	Upon further investigation, it was determined that Line 118, Valve V-A was lubricated during the 2015 maintenance (Notification 109956520). Please see attachment 1 "L-118A_V-A_SAP_Record.pdf" Please see attachment 2 "L 118A, RA-22, Valve V-1.pdf" According to the maintenance record, the valve could not be lubricated because of unsafe conditions. The valve is located along the fog line of Hwy 99. As an immediate solution, a notification was created to install a stop and grease fitting, and PG&E is planning to obtain traffic control to perform maintenance in upcoming next maintenance cycles until a long-term solution is completed. As a long-term solution, PG&E is creating a project to evaluate the valve location and relocation outside of the Caltrans right of way. In addition, two tailboards were held for the area's Maintenance and Construction personnel to reinforce the requirement to perform the valve lubricating in accordance with TD-4430P-04. See attachment 3 "Yosemite_Tailboards".	Att1_L-118A_V-A_SAP_Record.pdf Att2_L 118A, RA-22, Valve V-1.pdf Att3_Yosemite_Tailboards.pdf
NOV	1 (ii)	PG&E Procedure H-14 allows a maximum pressure reduction of 350 psi for a single run. SED found during records review regulator station RD-01 with a pressure reduction from 890 psi to 350 psi, which is greater than the maximum reduction of 350 psi specified in the design standard.	Please see attachment 4 "H-14." Section 3E includes an exception for HPR type stations that allows for the maximum acceptable pressure cut of 500 psi. RD-01 is categorized as an HPR-type district reg station. Please see attachment 5 "RD01_Maintenance Record." The primary regulator set point was increased from 350 psig to 400 psig. The operating pressure of the station is 870 psi. The increased pressure for the regulator set point meets the exception requirement.	Att4_H-14.pdf Att5_RD01_Maintenance Record.pdf
NOV	1 (iii)	iii) PG&E Procedure TD-4540P-01 requires supervisors to conduct a review of regulator station maintenance within 30 days of maintenance. SED found during records review regulator station RA-24 that had a supervisor review date of 3/15/2016 for an inspection on 12/18/2014 which exceeds PG&E's standard of 30 days.	PG&E has a created a quality management group that performs record reviews on 100% of completed maintenance on a monthly basis to ensure compliance, which includes supervisor reviews being completed timely.	N/A
NOV	2	Title 49 CFR §192.745(a) states: "Each transmission line valve that might be required during any emergency must be inspected and partially operated at intervals not exceeding 15 months, but at least once each calendar year." The Division did not conduct an inspection or partial operation in 2015 on the following transmission valves: <ul style="list-style-type: none"> • L-331 B-1, Valve V-0.76 • L-331 B-1, Valve V-B • L-331 A, Valve V-A • Crosstie 331A & 331B, Valve V-13 The Division inspected the following valves exceeding a 15 month interval: <ul style="list-style-type: none"> • OAK HP 30, Valve V-1 <ul style="list-style-type: none"> o Inspected on 1/17/2014 with subsequent inspection on 8/28/2015 • L-7224-09, Valve V-2 <ul style="list-style-type: none"> o Inspected on 5/7/2014 with subsequent inspection on 12/30/2015 • L-7224-19, Valve V-1 <ul style="list-style-type: none"> o Inspected on 6/9/2014 with subsequent inspection on 12/28/2015 	Please see below for the valve and Request for Work (RW) notifications to add the valve into a maintenance plan. <ul style="list-style-type: none"> • L-331 B-1, Valve V-0.76: RW111325939 • L-331 B-1, Valve V-B: RW 111325939 • L-331 A, Valve V-A: RW 111325939 • Crosstie 331A & 331B, Valve V-13: RW 111617120 <ul style="list-style-type: none"> • OAK HP 30, Valve V-1: The valve was scheduled for maintenance January 2015 under PR 109890974. Corrective 110045281 was created on 2/11/15 to dig up the valve to allow repair on the grease stem and operation. In August 2015, the technician replaced the valve stem without the need to dig. Please see attachment 6 "OAKHP30_V-1_WorkTicket&Card.pdf" • L-7224-09, Valve V-2: A project is being initiated to evaluate the removal of the valve. • L-7224-19, Valve V-1: A project is in place to replace the valve and MAOP configuration by the end of 2017. To prevent recurrence, I&R preventative maintenance have transitioned to AMBBS for weekly compliance reporting. The weekly compliance reports are reviewed regularly by the local supervisor and asset strategist to maintain oversight of pending actions by the required due date.	Att6_OAKHP30_V-1_WorkTicket&Card.pdf

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Finding Type [Internal, NOV, AOC]	Finding #	Finding	Response	Associated Attachment (File Name)
NOV	3	<p>Title 49 CFR §192.743(a) states: "Pressure relief devices at pressure limiting stations and pressure regulating stations must have sufficient capacity to protect the facilities to which they are connected. Except as provided in §192.739(b), the capacity must be consistent with the pressure limits of §192.201(a). This capacity must be determined at intervals not exceeding 15 months, but at least once each calendar year, by testing the devices in place or by review and calculations."</p> <p>The Division did not conduct annual reviews of capacity for the following relief devices:</p> <ul style="list-style-type: none"> • HPR B25 <ul style="list-style-type: none"> o 2011, 2013 • RA-08 <ul style="list-style-type: none"> o 2012 	<p>To prevent recurrence, in 2013, PG&E transitioned to electronic collection of data to SAP. Attachment 7 "Bulletin-4001B-003" (2013) describes electronic record keeping for maintenance & operation data, in lieu of recording on paper forms, which allows for improved safety, enhanced compliance records, operational flexibility, increased accessibility to M&O records, elimination of data duplication, and enhanced analytical ability. Attachment 8 "H-70_Pressure-Relief Devices" (2013) describes the process for capacity reviews. This includes documenting the capacity review on the Work Ticket in SAP. PG&E has conducted capacity reviews annually for these relief devices since the missed annual reviews.</p>	<p>Att7_Bulletin_TD-4001B-003.pdf Att8_H-70_Pressure-Relief_Devices.pdf</p>
NOV	4	<p>Title 49 CFR §192.605(b)(3) states: "The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations. Making construction records, maps, and operating history available to appropriate operating personnel."</p> <p>The Division did not make accurate maps available to the appropriate operating personnel for the following regulator stations:</p> <ul style="list-style-type: none"> • RA-47 <ul style="list-style-type: none"> o On 8/9/2013, a request was submitted to update the station diagram with correct valve numbering. Another request was submitted on 7/7/2015 for the same error. The map was updated electronically on 7/13/2014; however the hard copy in the regulator station maintenance folder was not updated until 5/5/2016. • RA-25 <ul style="list-style-type: none"> o On 12/14/2012, a request was submitted to update the station diagram with correct valve numbering. Additional requests were submitted on 6/5/2013 and 5/3/2016 for the same error. The station diagram was still not updated, neither electronically or a hard copy, at the time of the SED inspection. • RC-22 <ul style="list-style-type: none"> o On 2/23/2016, a request was submitted to update the station diagram to include the inlet fire valve. An additional request was submitted on 3/14/2016 for the same error. The station diagram was still not updated, neither electronically or a hard copy, at the time of the SED inspection. 	<p>Please see Attachment 9 "RA47_Operating_Diagram" for an updated and prior copy of the operating diagram. The prior operating diagram included handwritten changes while the new diagram was being processed. The updated diagram has been placed in the folder.</p> <p>Please see Attachment 10 "RA-25_Operating_Diagram" for an updated copy of the operating diagram. The diagram has been updated electronically and also placed in the folder.</p> <p>Please see Attachment 11 "RC-22_Operating_Diagram" for a copy of the operating diagram with handwritten notes. The diagram has been placed in the folder and RW 111751974 and CAP 7031775 was created to update the map electronically. The electronic update for the diagram is in process.</p> <p>In October 2014, TD-4460P-11 "Gas Map Corrections" was published to provide the required steps personnel must follow for a gas map correction using the Corrective Action Program (CAP). This procedure was developed as a key control to identify, report, create, process, and audit map corrections. When a discrepancy is identified, TD-4460P-11-F01 "Gas Map Correction Form" is required to be completed along with creating a CAP item and associated tasks to update the map. Attached, please find attachment 12 - "TD-4460P-11" and attachment 13 - "TD-4460P-11-F01".</p> <p>In addition, in July of 2015, a 5 Minute Meeting was developed to reinforce that the use of accurate, up-to-date operating diagrams and maps are vital to the safe and reliable operation of transmission gas facilities. Links to all of the operating diagrams and maps that have been revised since August of 2014 are now provided and hardcopies are no longer automatically distributed. The online database is the system of record for operating maps, the copies within the maintenance folder are for reference only. A file showing all of the updated operating diagrams and maps from August, 2014 to the present, including links to these documents, is updated and distributed on a regular basis. A total of 643 operating diagrams and maps have been revised since August, 2014 through July 1, 2016. Attached, please find attachment 14 - "5 Minute Meeting-Updated GT Operating Diagrams and Maps" and attachment 15 - "OMOD Aug 2014 - July 1 2016".</p>	<p>Att9_RA47_Operating_Diagram.pdf Att10_RA25_Operating_Diagram.pdf Att11_RC22_Operating_Diagram.pdf Att12_TD-4460P-11.pdf Att13_TD-4460P-11-F01.doc Att14_5 Minute Meeting-Updated GT Operating Diagrams and Maps_CONF.docx Att15_OMOD Aug 2014 - July 1 2016_CONF.xlsx</p>
NOV	5	<p>5. Title 49 CFR §192.739(a) states:</p> <p>"Each pressure limiting station, relief device (except rupture discs), and pressure regulating station and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests"</p> <p>The Division did not conduct an annual inspection of regulator station RA-24 in 2015.</p>	<p>Please see attachment 16 "RA24_Maintenance_Record." RA-24 was last maintained on May 19, 2016.</p> <p>To prevent recurrence, the annual maintenance was updated in SAP to provide notification and ensure timely maintenance.</p> <p>In addition, I&R preventative maintenance has transitioned to AMBBS for weekly compliance reporting. The weekly compliance reports are reviewed regularly by the local supervisor and asset strategist to maintain oversight of pending actions by the required due date.</p>	<p>Att16_RA24_Maintenance_Record.pdf</p>

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NOV	6	<p>Title 49 CFR §192.739(a)(2) states: "Each pressure limiting station, relief device (except rupture discs), and pressure regulating station and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests to determine that it is— Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed"</p> <p>The Division documented that regulator station RB-36 did not achieve lockup in 2010, 2012, 2014, and 2015. Inspection notes for 2014 and 2015 state "Replace diaphragm on the regulator due to poor lock-up" however, no cause for not achieving lockup was documented on the maintenance sheet. The Division failed to prevent recurrence by replacing the diaphragm and therefore failed to ensure adequacy from the standpoint of reliability of operation.</p>	<p>Please see attachment 17 "RB36_Maintenance_Record." As mentioned in the inspection notes for 2014 and 2015, the diaphragm was replaced due to no lock-up on 3/27/14 and 2/9/15. PG&E completed a B-inspection on 2/29/16 and found no issues.</p> <p>In addition, the supervisor tailboards were held for the area's T&R personnel to reinforce documentation for not achieving lockup on the maintenance sheet. Please see attachment 3 "Yosemite_Tailboards."</p>	<p>Att17_RB 36_Maintenance_Record.pdf</p> <p>Att3_Yosemite_Tailboards.pdf</p>
AOC	1	<p>During SED's field inspection of regulator station MO HP 65A #2, lockup could not be achieved on the right run (looking downstream). Replacing the diaphragm boot resulted in achieving lockup; however, this is a recurring issue for this station. In 2010, 2012, 2014, and 2015 this station could not achieve lockup during annual maintenance.</p> <p>Please provide to SED what PG&E plans to do to mitigate this recurring issue.</p>	<p>As an immediate solution, PG&E met with the third-party regulator supplier, Tri-Pacific in July 2016 at station MO HP65A. The Tri-Pacific representative performed a demonstration with the technicians on aligning the boot to prevent shifting. In addition, the representative recommended to replace the regulator throttle plates. These plates will be ordered in 2016 and replaced when they become available.</p> <p>As a long-term solution, CAP 7029435 was generated to plan and track the rebuild for regulator station MO HP 65A. Please note that there is a project planned to address the piggability at this station and the rebuild of the station was added to the project scope. The project is expected to be executed in 2018.</p>	<p>N/A</p>
AOC	2	<p>During SED's field inspection of regulator station MO HP 61, lockup could not be achieved on the right run (looking downstream). This station did not lock up in 2015 as well and all pilots were replaced in 2015 as noted in maintenance notes.</p> <p>Please provide to SED what PG&E plans to do to mitigate this recurring issue.</p>	<p>Please see attachment 19 "MO HP61_Maintenance_Record." Below is a maintenance timeline and repairs.</p> <p>2014: Right run regulator did not lock up due to pilot issues. Corrective: New mooney pilots were installed on all 4 regulators.</p> <p>2015: Regulators locked up fine, no issues identified.</p> <p>2016: Right run regulator did not lock up due to build-up on the boot. Corrective: The regulator was re-built and locked up fine.</p> <p>Please see attachment 19 "TD-4540P-01." Section 2.8 and Section 3.6.3 describes the procedure if sulfur is present on station internal components. The tasks include documenting sulfur presence on the maintenance record, clean or replace affected components, notify the senior gas quality engineer, and creating a corrective if the station contains pilot operated equipment. To prevent recurrence, CAP 7033033 was created to evaluate this issue, if it is a localized or systemic issue, and also will identify and implement corrective and preventative actions as warranted.</p>	<p>Att18_MOHP61_Maintenance_Record.pdf</p> <p>Att19_TD-4540P-01.pdf</p>

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AOC	3	<p>During SED's review of pressure regulator station records, SED noted discrepancies between the hard copy of the Operating Diagram and the information in PG&E's electronic database, SAP. Field technicians are referring to the Operating Diagram for the correct information while performing maintenance.</p> <p>Please provide SED the corrective actions taken by PG&E to prevent this issue from reoccurring.</p>	<p>To prevent reoccurrence, in October 2014, TD-4460P-11 "Gas Map Corrections" was published to provide the required steps personnel must follow for a gas map correction using the Corrective Action Program (CAP). This procedure was developed as a key control to identify, report, create, process, and audit map corrections. When a discrepancy is identified, TD-4460P-11-F01 "Gas Map Correction Form" is required to be completed along with creating a CAP item and associated tasks to update the map. Attached, please find attachment 12 - "TD-4460P-11" and attachment 13 - "TD-4460P-11-F01".</p> <p>In addition, in July of 2015, a 5 Minute Meeting was developed to reinforce that the use of accurate, up-to-date operating diagrams and maps are vital to the safe and reliable operation of transmission gas facilities. Links to all of the operating diagrams and maps that have been revised since August of 2014 are now provided and hardcopies are no longer automatically distributed. A file showing all of the updated operating diagrams and maps from August, 2014 to the present, including links to these documents, is updated and distributed on a regular basis. A total of 643 operating diagrams and maps have been revised since August, 2014 through July 1, 2016. Attached, please find attachment 14 - "5 Minute Meeting-Updated GT Operating Diagrams and Maps" and attachment 15 - "OMOD Aug 2014 - July 1 2016".</p>	<p>Att12_TD-4460P-11.pdf</p> <p>Att13_TD-4460P-11-F01.doc</p> <p>Att14_5 Minute Meeting-Updated GT Operating Diagrams and Maps_CONF.docx</p> <p>Att15_OMOD Aug 2014 - July 1 2016_CONF.xlsx</p>