



**Public Utilities Commission**  
**STATE OF CALIFORNIA**

**Citation Date:** January 30, 2015  
**Citation #:** ALJ 274 15-01-006  
**Operator ID#:** 15007

**SED Investigation Report 12/19/14**

**August 2, 2013 PG&E GO 112-E Meridian District Audit Finding - Notice of Violation**  
**The District did not set to operate its relief valve within the allowable limit established by**  
**Title 49 CFR §192.201.**

**Utility:** Pacific Gas & Electric Company (PG&E)

**Utility Operating Unit:** Pacific Gas and Electric Company's (PG&E) Gas Business Unit

**Subject of Report:** Audit Finding – The District did not set to operate its relief valve within the allowable limit established by Title 49 CFR §192.201.

**Audit Title:** General Order 112-E Audit of PG&E's Meridian District Audit

**Date of Audit:** May 7-10, 2013

**SED Investigator:** Terence Eng

**Summary:**

**1. 49 CFR §192.201**

*“(a) Each pressure relief station or pressure limiting station or group of those stations installed to protect a pipeline must have enough capacity, and must be set to operate, to insure the following:*

*(2) In pipelines other than a low pressure distribution system:*

*(i) If the maximum allowable operating pressure is 60 p.s.i. (414 kPa) gage or more, the pressure may not exceed the maximum allowable operating pressure plus 10 percent or the pressure that produces a hoop stress of 75 percent of SMYS, whichever is lower,”*

The California Public Utilities Commission's (CPUC) Safety and Enforcement Division (SED) audit letter stated, *“The District's Self-Contained Relief Valve Maintenance Record, TD-4430-02-F06, for Durham Field, L-136, states an MAOP of 550 psig. The District set its relief valve protecting the system at 800 psig for two weeks from 10/15/12 to 11/1/12. The District did not set to operate its relief valve within the allowable limit established by Title 49, CFR §192.201.”*

## Enclosure 1



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### Findings:

The staff of the Safety and Enforcement Division (SED), Gas Safety and Reliability Branch (GSRB) conducted a General Order 112-E audit of Pacific Gas and Electric Company's (PG&E) Meridian District from May 7-10, 2013. The audit consisted of a review of PG&E's Operations and Maintenance records maintained by PG&E's Meridian District. SED conducted field inspections as a part of this audit.

On August 2, 2013, SED staff notified PG&E of its audit findings, consisting of eleven violations of the code of federal regulations and eight areas of concern. Of the eleven violations, SED determined that PG&E's corrective action plans were acceptable for ten, and the violations did not create any hazardous conditions for the public and utility employees. SED may review the implementation of the corrective actions addressing those ten violations during future inspections. However, violation #2.1 of the audit letter, where PG&E failed to set to operate its relief valve within the allowable limit, is a violation of 49 CFR §192.201. This violation is considered to have serious public safety implications.

PG&E responded to violation #2.1 in its audit letter response dated October 14, 2013 stating, "*PG&E agrees with this finding. Meridian District conducted a tailboard briefing on September 20, 2013 to ensure relief valve set points do not exceed pressure established per 192.201. Please see Attachment SUP-A.*"

### Recommendations:

It is imperative that PG&E operate its gas systems in compliance with GO 112-E and in a manner that promotes and safeguards the health and safety of the public. However, by not setting its relief valve to operate within the allowable limit established by Title 49 CFR §192.201, PG&E potentially created a hazardous condition for the public and utility employees.