

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

September 25, 2016

GI-2016-03-GRS38-01B

Mr. David A. Weber, President and CEO (Dave.Weber@nwnatural.com)Gill Ranch Storage
220 NW 2nd Avenue
Portland, OR 97209

SUBJECT: General Order 112 Gas Inspection of Gill Ranch Storage

Dear Mr. Weber:

On behalf of the Safety and Enforcement District (SED) of the California Public Utilities Commission, Joel Tran and Willard Lam conducted a General Order 112¹ inspection of Gill Ranch Storage (GRS) from March 7-9, 2016. The inspection included a review of operation and maintenance records including pressure regulation and valves for the years 2013 through 2015, as well as a field inspection of a representative sample of GRS facilities, including the compressor station. SED staff also reviewed operator qualification records, which included a field observation of selected individuals performing covered tasks.

SED's findings are noted in the Summary of Inspection Findings (Summary) which is enclosed with this letter.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by GRS to address the violations and observations noted in the Summary. Pursuant to Commission Resolution ALJ-274, SED staff has the authority to issue citations for each violation found during the inspection.

If you have any questions, please contact Joel Tran at (415) 703-1508 or by email at joel.tran@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Kenneth A. Bruno".

Kenneth Bruno
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement District

Enclosure: Summary of Inspection Findings

cc: Karl Leger, RegSafe (Karl.Leger@regsafe.com)
Todd Thomas, GRS (Tthomas.nwngs@nwnatural.com)
Dennis Lee, SED (Dennis.Lee@cpuc.ca.gov)
Terence Eng, SED (Terence.Eng@cpuc.ca.gov)

¹ General Order 112-F was adopted by the Commission on June 25, 2015 via Decision 15-06-044.

SUMMARY OF INSPECTION FINDINGS

I. Area of Concern / Recommendations

1. During the record review, SED discovered that GRS hires a third party (Basin Valve Company) to conduct maintenance on their pressure relief devices. Basin Valve Company follows its own pressure relief device maintenance procedure written by Basin Valve Company and approved by GRS, instead of the one written by GRS. SED recommends removing or archiving the procedure written by GRS if it has no foreseeable use. SED also recommends GRS update its procedures to accurately list those covered tasks conducted by their own personnel, and those conducted by contractors.

2. GRS documented valve inspection and maintenance on its roll charts. The inspection and maintenance is performed with at least two individuals; however, the roll charts list only one individual per inspection. The individual listed in the roll chart may or may not be the qualified individual for the covered task. Span of Control is allowed within the operator qualification plan however SED recommends GRS document all individuals that performed the valve inspection and maintenance to ensure the qualified individual is represented for the covered task.