

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



January 12, 2018

GI-2017-12-GRS38-08

Mr. David A. Weber, President and CEO ([Dave.Weber@nwnatural.com](mailto:Dave.Weber@nwnatural.com))

Gill Ranch Storage  
220 NW 2nd Avenue  
Portland, OR 97209

SUBJECT: General Order 112-F Gas Inspection of the Gill Ranch Transmission Integrity Management Plan (TIMP) and Records.

Dear Mr. Weber:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission, Paul Penney, Alan Bach, Dmitriy Lysak and Molla Mohammad Ali conducted a General Order 112-F inspection of the Gill Ranch Storage (GRS) TIMP from December 4-8, 2017. The inspection included a review of GRS's TIMP and associated records.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by GRS to address the recommendations and respond to the data requests noted in the Summary.

If you have any questions, please contact Paul Penney at (415) 703-1817 or by email at [paul.penney@cpuc.ca.gov](mailto:paul.penney@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](mailto:Karl.Leger@regsafe.com))  
Todd Thomas, GRS ([Tthomas.nwngs@nwnatural.com](mailto:Tthomas.nwngs@nwnatural.com))  
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## SUMMARY OF INSPECTION FINDINGS

### **1. Protocol Area A: Identify HCAs**

No issues identified.

### **2. Protocol Area B: Baseline Assessment Plan**

We are past the baseline period. This section was skipped.

### **3. Protocol Area C: Identify Threats, Data Integration, Risk Assessment**

**C.02.e.** Verify that the operator's program includes measures to ensure that new information is incorporated in a timely and effective manner, as addressed in Protocol K. [§192.911(k), ASME B31.8S-2004, Section 11(b) and ASME B31.8S-2004, Section 11(d)]

#### **Issue Identified**

RECOMMENDATION: Expand on the process for how information is incorporated in a "timely and effective" manner. This is referenced in section TIMP, Section 4.2.2.

### **4. Protocol Area D: DA Plan**

N/A

### **5. Protocol Area E: Remediation**

No issues identified.

### **6. Protocol Area F: Continual Evaluation and Assessment**

No issues identified.

### **7. Protocol Area G: Confirmatory DA**

N/A

### **8. Protocol Area H: Preventative and Mitigative Measures**

**H.07.a.** Verify that an adequate risk analysis-based process is used to determine if an automatic shut-off valve or remote control valve should be added. [§192.935(c)]

- i. Verify that, as a minimum, the following factors were considered: [§192.935(c)]
  1. swiftness of leak detection and pipe shutdown capabilities
  2. the type of gas being transported
  3. operating pressure
  4. the rate of potential release
  5. pipeline profile
  6. the potential for ignition
  7. location of nearest response personnel

**Issue Identified**

RECOMMENDATION: For Appendix M, the ASV or RCV form has only 17 factors, instead of 18. The formula needs to be revised.

Data Request (DR) #1: Send a copy of Appendix J filled in on 9-18-12.

**9. Protocol Area I: Performance Measures**

**I.01.b.** Verify the process to evaluate IM program effectiveness includes an adequate set of performance metrics to provide meaningful insight into IM program performance.

**Issue Identified**

RECOMMENDATION: Where such metrics would provide meaningful insight, SED staff recommends you add “Process/Activity”, “Operational” and “Direct Integrity” metrics. See B31.8S-2004, Table 8 for examples of leading and lagging metrics for each of the three categories identified above.

**10. Protocol Area J: Record Keeping**

No issues identified

**11. Protocol Area K: Management of Change (MOC)**

No issues identified

**12. Protocol Area L: Quality Assurance**

**13. L.01.d.** Verify that when an operator chooses to use outside resources to conduct any process that affects the quality of the integrity management program, the operator ensures the quality of such processes and documents them within the quality program. [ASME B31.8S-2004, Section 12.2(c)]

**Issue Identified**

DR#2: Per GRS’s and the ILI Vendor procedures, please provide a copy of the pre-ILI and post-ILI inspection checks for the last ILI run conducted February 22, 2017.

**14. Protocol Area M: Communications Plan**

No issues identified

**15. Protocol Area N: Submittal of Program Documents**

No issues identified