

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 8, 2016

Mr. Sumeet Singh, Vice President
Pacific Gas and Electric Company
Gas Asset and Risk Management
6111 Bollinger Canyon Road, Room 4590-D
San Ramon, CA 94583

GI-2016-05-PGE19-01B

SUBJECT: General Order 112 Gas Inspection of PG&E's Burney District

Dear Mr. Singh:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112 inspection of Pacific Gas & Electric Company's (PG&E) Burney District (District) from May 9-13, 2016.¹ The inspection included a review of the District's records for the period of 2013 through 2016, as well as a representative field sample of the District's facilities. SED staff also reviewed the District's operator qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED's findings are noted in the Summary of Inspection Findings (Summary) which is enclosed with this letter. The Summary reflects only those records and pipeline facilities that SED inspected during the inspection.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by PG&E to address the violations 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 Nathan Sarina at (415) 703-1555 or by email at Nathan.Sarina@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 Division

Enclosure: Summary of Inspection Findings

cc: Mike Bradley, PG&E Compliance
Susie Richmond, PG&E Gas Compliance

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

SUMMARY OF INSPECTION FINDINGS

I. Probable Violations

A. PG&E's Internal Audit Findings

Prior to the start of the audit, PG&E provided SED its findings from the internal review it conducted of Burney District (District). 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) §192.13(c) or §192.605(a). SED is aware that PG&E corrected some of its findings prior to SED's inspection. Table 1 lists all of the violations from PG&E's internal review.

Table 1: PG&E's Internal Review

Code Section	# of Non-Compliance	Finding Description	Corrective Action	Remediation Date
192.605(a)	212	During valve maintenance, if a valve (emergency or reliability) was partially operated the reason for the partial operation was not noted in "Action Taken" on the Gas Valve Maintenance Record (TD-4430P-04-F02) as required by Gas Valve Maintenance Work Procedure TD-4430P-04.	Burney District maintenance personnel began noting the reason for partially operating valves on 1/1/2016. (CAP # 7023161). In regards to monthly inspection and partial operation of monitor valves and standby regulator valves Burney District maintenance personnel received a refreshed on completing the documentation.	1/01/2016
192.605(a)	40	TD-4430P-04-F01, and TD-4430P-04-F02 were not used to track valve maintenance on reliability valves as outlined in TD-4430P-04, instead the District tracked its reliability valve maintenance in PLM.	Additionally on 3/1/2016 Willows District will begin using the AMBBS version of SAP for maintenance. All information captured on TD-4430-P04-F02 is captured and viewable in AMBBS.	1/01/2016
192.605(a)	14	Monthly inspection and partial operation of controller-operated monitor valves and standby regulator valves is not documented on TD-4430P-04-F02, instead maintenance is documented on a District specific forms (monthly routine) and/or in PLM.	Bulletin TD-4001B-003 (2013) introduces electronic collection of data by gas field personnel allowing for improved safety, enhanced compliance records, operational flexibility, increased accessibility to M&O records, elimination of data duplication, and enhanced analytical ability.	5/5/2016

192.605(a)	1	Burney District did not document the capacity review of power gas relief PSV-191S in 2015	A Burney District Gas technician performed a capacity review of the power gas relief PSV-191S on 1/7/2015. PLM equipment history, the technician's time card and a note show the work as having been completed, but not adequately documented. See CAP #70288111. Burney District began using AMBBS version of SAP to assign maintenance to District personnel and store maintenance data on 3/16/2016.	1/25/2016
192.739(a)	1	Burney District did not document the capacity review of power gas relief PSV-136S in 2015	On 5/15/2015 a Burney technician reviewed the calculations and noticed a different model number on the calculations. Engineering later discovered that it had been the different model number represented the same relief valve model. Burney District began using AMBBS version of SAP to assign maintenance to District personnel and store maintenance data on 3/16/2016.	5/4/2016
192.739(a)	1	Burney District did not document the capacity review of power gas relief PSV-197S in 2015	PSV-197S was previously a package relief, and a calculation review was not required, but on 10/23/14 the relief was changed and the facility engineer provided calculations. This change was not carried over to PLM and subsequently the 2015 calculation review was missed. Burney District began using AMBBS version of SAP to assign maintenance to District personnel and store maintenance data on 3/16/2016.	1/29/2016

192.605(a) 192.739(a)	1	Burney Compressor Station relief PSV-187S, a self-contained relief valve, was documented on a package relief form without required capacity calculations or annual capacity reviews	The facility engineer reviewed the capacity of PSV-187S and determined the existing relief to be insufficient. The facility engineer then used form FH70A to calculate the necessary capacity and recommended a replacement relief valve. The maintenance organization replaced the relief and completed the documentation. CAP # 7028812.	4/25/2016
192.605(a)	1	Burney District did not fully document an annual station leak survey for Shingletown Pressure Limiting Station in 2015	A Burney District mechanic performed a station leak survey on 5/11/15, but did not document the survey on form TD-4110P-03-F20. PLM Report 7 and an “A-form”, which document leak survey activity on 5/11/15 at Shingletown, have been placed in binder 14, tab 6. CAP #7028813.	Pending

B. SED Findings

Title 49 CFR §192.201(a) states in part:

“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. 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;*

In 2016 the facility engineer reviewed the capacity of PSV-187S and determined the existing relief to be insufficient. The facility engineer then used form FH70A to calculate the necessary capacity and recommended a replacement relief valve which was later installed. PG&E was unable to determine the date of installation of the original relief valve and instead indicated an in-service date of December 18, 2003. PG&E is in violation of 49 CFR §192.201(a)(2)(i) for not having adequate relief capacity from the in-service date to the corrected date. SED notes that PG&E included this finding in their internal review and has completed corrective action. However, SED finds the description of the finding different than what was disclosed on the internal review.