

## 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 -2016-10-PGE26-01B

SUBJECT: General Order 112 Gas Audit of PG&E's Topock 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) Topock District (District) on October 18-20, 2016.<sup>1</sup> The audit included a review of the District's operation and maintenance records for the years 2013 through 2015, as well as a representative field sample of the District's facilities and observation of performance of covered tasks by field employees.

SED's findings are in the Summary of Inspection Findings (Summary) which is enclosed with this letter. The Summary reflects only those particular records and pipeline facilities that SED inspected during the audit. The findings identified in this letter do not require a response from PG&E at this time.

This letter serves as the official closure of the 2016 PG&E Topock District inspection and any matters that are being recommended for enforcement will be processed through the Commission's Citation Program or formal proceeding.

If you have any questions, please contact Fred Hanes at (415) 703-5264 or by email at fred.hanes@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

<sup>1</sup> General Order 112-F was adopted by the Commission on June 25, 2015 via Decision 156-06-044.

cc: Mike Bradley, PG&E Compliance  
Susie Richmond, PG&E Compliance  
Glen Allen, PG&E Compliance  
Aimee Cauguiran, GSRB  
Dennis Lee, GSRB

## SUMMARY OF INSPECTION FINDINGS

### 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 the District. Some of PG&E’s internal review findings are violations of PG&E’s operations and maintenance standards, and are therefore violations of Title 49 Code of Federal Regulations (CFR), §192.13(c). Table 1 lists all of the violations that PG&E noted.

**Table 1: Findings from PG&E’s Internal Review**

Topic	Item	Code	Finding	Instances	Corrected
VALVES	1	§192.13(c).	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.	25	01/01/2016
	2	§192.13(c).	TD-4430P-04-F01, (Gas Valve Maintenance Record Form—General Information) and TD-4430P-04-F02, (Gas Valve Maintenance Record Form—Service History) were not used to track valve maintenance on transmission maintenance and transmission operational valves as outlined in TD-4430P-04. Prior to 11/1/2015 the District tracked its reliability valve maintenance in PLM.	249	11/01/2015
	3	§192.13(c).	Monthly inspection and partial operation of controller-operated monitor valves and standby regulator valves are not documented on TD-4430P-04-F02, (Gas Valve Maintenance Record Form—Service History) as outlined in TD-4430P-04. Maintenance is documented on District specific forms (monthly routine) and/or in PLM or SAP. Topock District does not perform or document 2 week lubrication of frequently operated regulator valves on TD-4430P-04-F02 (Gas Valve Maintenance Record Form—Service History).	all	03/01/2016
	4	§192.13(c).	2016 actuator maintenance for power actuated valve # V-50.61 L-300B was recorded on outdated form TD-4430P-02-F03.	1	10/13/2016
	5a	§192.13(c), §192.805(b)	Actuator Maintenance is required annually per TD-4545P-09.for V-30.40 and V-50.61. In February of 2016 the required actuator maintenance for V-30.40 was completed by an Employee who held the required 14-01 OQ. However, in August 2016 the non-required August actuator maintenance for V-30.40 was performed by an Employee who did not hold the 14-01 OQ.  In 2016 both required annual and non-required semi-annual Actuator Maintenance for V-50.61 was completed by an Employee which does not hold the 14-01 OQ.	3	10/14/2016
	5b	§192.13(c), §192.805(b)	Valve maintenance is required semi-annually per TD-4430P-04 for V-30.40 and V-50.61. Semi-annual was performed for both valves on 8/22/16 by an Employee which does not hold the 14-01 OQ.	2	10/14/2016

REG STATIONS	1	§192.13(c)	Amboy Reg Station and Amboy Secondary Reg Station, dual run stations, during the 2016 maintenance did not have the working and stand-by regulator runs switched.	2	10/13/2016
	2	§192.743(a)	On 3/13/2013 it was determined the relief, PSV-4, for R611, Sunworld Trailer Park had inadequate capacity. On 4/4/2013 T&R Gas Control Technician from Kern Division replaced the regulator and distribution engineering updated calculations showing adequate capacity.	1	04/04/2013
	3	§192.743(a)	On 3/13/2013 it was determined the relief, PSV-1, for R612, Amboy Water Well Regulator Station had inadequate capacity. On 4/9/2013 T&R Gas Control Technician from Kern Division replaced the relief.	1	04/09/2013
	4	§192.743(a)	Internal reviews found the following relief valve maintenance was not performed and documented in 2015: C-FG-11, C-FG-12.	2	10/13/2016
CALI-BRATION	1	§192.13(c)	Combustible Gas Indicators #11627 and #11628. July 2014 monthly verification of calibration exceeded 45 days.	2	10/13/2016

## **B. SED Findings**

No additional violations were found during the audit.

## **II. Areas of Concerns/ Observations/ Recommendations**

SED reviewed Daily Field Weld Summary reports for Topock welding projects during 2013-2015. On one of the report pages from job # 30856313 in 2013, SED noted that weld acceptance information was missing for weld FW-74. In response to a data request, PG&E confirmed that while the data was missing on that report, the radiography report showed that the weld in question was found acceptable.

PG&E noted that they have enhanced the inspection document Quality Control (QC) processes since 2013. The Gas Transmission Construction Quality Control Manual, released in 2015, includes sample forms and job aids detailing how to complete specific inspection forms. Additionally, inspectors now receive additional training to ensure they understand and comply with PG&E standards and procedures. QC Review of completed inspection documents and validation of data are also performed in a timely manner to confirm all “required” data are present and verified by the responsible party, and inspectors receive appropriate coaching directly from QC Reviewers if any corrections to their documents are necessary.

This item serves as a record of SED’s observation and no additional response from PG&E is needed at this time. SED has determined that the corrective actions performed by PG&E sufficiently addressed the AOC. SED may opt to test the corrective action at a future date.