

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 20, 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-2016-02-PGE20-02B

SUBJECT: General Order 112 Gas Inspection of PG&E's Willows 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) Willows District (District) from February 8-12, 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 and concerns/ recommendations noted in the Summary.

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 Regulatory 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 Willows 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 all 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)	215	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.	Willows District maintenance personnel received a refresher course on completing documentation. (CAP # 7023161). Additionally on 3/1/2016 Willows District will begin using the AMBBS version of SAP for maintenance. Procedure TD-4001B-003 allows for deviation from work processes and procedures. Electronic records supersedes and takes the place of the paper form.	2/2/2016
192.605(a)	202	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.		2/2/2016
192.605(a)	7	Willows District does not document two week lubrication of frequently operated regulator valves on TD4430P-04-F02, instead it is documented in PLM		2/2/2016
192.605(a)	18	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.		2/2/2016

192.605(a)	7	Willows District identified 2” or smaller valves used to evacuate a blowdown stack between the main blowdown valve and a blind flange as not being on an operating map or maintenance plan.	The identified valves have been entered into PLM and been entered onto operating maps and/or diagrams.	2/3/2016
192.467	1	ETS at 213.09 was not added to the Willows maintenance program (PLM) when the casing was installed in 2013.	In 2013, at the time of the ETS installation the maintenance task was entered into SAP and not PLM.	1/2016
192.605(a)	1	ETS at Wild Goose was not added to the Willows maintenance program (PLM) when installed in 11/21/2012.	In 2012, at the time of the ETS installation the maintenance task was entered into SAP and not PLM. This ETS is used for mark and locate purposes and not part of PG&E’s normal maintenance of providing reads.	1/2016

B. SED Findings

1. Title 49 CFR §192.743(a) states: ”Pressure relief devices at pressure ... This capacity must be determined at intervals not exceeding 15 months, but at least once each calendar year, by testing the devices in place or by review and calculations.”
 - a. SED reviewed PG&E’s capacity review of relief devices at Pressure Limiting and Regulating Stations and found at Buckeye Creek Pressure Limiting Station V-A that the capacity review was not conducted for the calendar year of 2014.
 - b. SED reviewed PG&E’s capacity review of relief devices at Pressure Limiting and Regulation Stations and found that a subsequent calculation had not been performed for PSV-G-11 after the station rebuild had changed conditions for PSV-G-11.

II. Areas of Concern / Recommendations

During SED’s sampling of field locations it was observed that PG&E employees were performing valve maintenance activities on “hard to operate” valves with “cheater bars” some of which violate length requirements under procedure TD-4430P-04 Appendix E. What is the status on exploration of a new tool, as was mentioned in PG&E response to SED’s Operations and Maintenance Audit 2014 AOC-8.0? How will utility workers comply with the Appendix D and E of procedure TD-4430P-04 if the tool has not been made available? Does Appendix E need to be revised such that maximum wrench length is increased?