

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 2, 2018

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

GI-2017-11-PGE-02-02A, 02B, 02C

SUBJECT: SED's Closure Letter for General Order 112-F Gas Inspection of PG&E's Diablo Division

Dear Mr. Singh:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Pacific Gas and Electric Company's (PG&E) response letter dated February 16, 2018 for the findings identified during the General Order (GO) 112-F Inspection of PG&E's Diablo Division which was conducted from November 27-December 1, 2017.

A summary of the audit findings documented by the SED, PG&E's response to our findings, and SED's evaluation of PG&E's response taken for each identified Violation and Area of Concern and Recommendation is attached.

This letter serves as the official closure of the 2017 GO 112-F Inspection of PG&E's Diablo Division and any matters that are being recommended for enforcement will be processed through the Commission's Citation Program or a formal proceeding.

Thank you for your cooperation in this inspection. Please contact Sikandar Khatri at (415) 703-2565 or by email at Sikandar.Khatri@cpuc.ca.gov if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee".

Dennis Lee, P.E.
Program and Project Supervisor
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
Kelly Dolcini, SED
Kenneth Bruno, SED

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 Diablo Division (Division). 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 and others are due to be completed at later dates. Please provide an update on the findings that were still pending at the time of the audit.

PG&E's Response:

There were 4 open items on the internal review summary during the time of the Diablo Audit. Please see updates below:

1. Missing or incorrect size EFV's - 5 of 15 services with EFV issues have been corrected. The remaining jobs are scheduled to be completed in 2018. Please see attached "DI_EFV_Update_CONF.pdf" for details.
2. For the specific location identified in the internal review summary (CAP 112743104), GIS was updated to show the conversion of the section of service into main. CAP 7042033 was created to identify other potential locations and to update GIS, as needed.
3. CAP 113034039 was created for a missing 10-02 OQ issue on 2 jobs. For PM #31335263, KARH's weld at 1265 Vine Ave in Martinez was cut out and rewelded by J3CL on 7/13/17 (see attached "PM31335263_Docs_CONF.pdf"). Upon further review, there was both a qualified welder and qualified weld inspector on the job for PM 42438756 and there was an error in filling out the A-form. Please see attached "CAP113034039-OQ.pdf" for qualifications for RXWU.
4. Project RT-722 (PM #97004661) was created to replace the inoperable valve G inside Bailey Rd valve lot to address CAP #7029107. The project was tied in on 11/17/17 and is currently in the close-out phase.

SED's Conclusion:

PG&E has provided information on actions taken on open items. These are accepted; SED may request an update on the work which is scheduled to be completed in 2018.

B. SED Findings

1. Title 49 CFR §192.13(c) states in part:

“Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.”

1.1. While reviewing the Operator Qualification (OQ) records of PG&E employees, it was found that OQ Task 04-01 Soap test/stand-up of one employee had expired. Upon inquiry, PG&E explained that this task is now covered under 04-03 Leak Test at Operating Pressure and it has replaced Task 04-01.

However, PG&E procedure TD-4540P-01 (Maintenance of Regulator Stations) – Rev 1c still lists OQ task 04-01 Soap test/stand-up test as one of the requirement for PG&E personnel performing station maintenance. The PG&E procedure needs to be updated.

PG&E’s Response:

PG&E recognizes that there are procedures that contain outdated operator qualification requirements, including TD-4540P-01. PG&E is updating qualification requirements with a reference to the Operator Qualification Task List in newly published procedures. For TD-4540P-01, ECTS task #161449 was created to update the OQ requirement during the next procedure update.

SED’s Conclusion:

PG&E has taken corrective action which is accepted.

1.2. PG&E procedure TD-4540P-01, Section 1.3 under Preliminary Maintenance Steps, states in part:

“6. Ensure accuracy of both station diagram copies...7.Ensure accuracy of Form TD-4540P-01-F01, ‘Regulator Station Datasheet’...”

SED reviewed the records for the Regulator Station DRC-24. It was observed that the request made by technician for correction on station diagram on 11/12/2016 was completed, however there was additional request made that required correction of valve numbers on station diagram and regulation station datasheet. The correction has not been made. Please make the correction and provide corrected copies of the documents.

PG&E’s Response:

PG&E agrees with the concern and have taken the following corrective action: The station diagrams were updated. Please see attached updated station diagrams.

SED’s Conclusion:

PG&E has taken corrective action which is accepted.

Areas of Concern/ Observations/ Recommendations:

During field inspection, following were observed:

1. Cathodic Protection (CP), pipe-to-soil Read - Yearly - CP area 1911
42835911 - Approx. 175 ft. of Clayton Road, Concord
At this site, the appropriate read could not be obtained. The wires were also buried in pebbles/ground. This needs troubleshoot and also appropriate installation.

PG&E's Response:

The initial pipe-to-soil read at the ETS was a bad read due to broken wires, but the second pipe-to-soil read at the main line valve was -1,105 mV.

PG&E agrees with the concern and have taken the following corrective action: The broken wires were repaired on 1/6/18 under Notification #114205089. Please see attached "ConcordMeteringStationETSRRepair.jpg" for photos for the repair. A p/s read was obtained on the same day as -1064 mV.

SED's Conclusion:

PG&E has taken corrective action.

2. CP area D57-6 REC
42111245 - 22 Belshaw Drive, Antioch
The wrap on the riser at air-concrete surface interface was missing resulting in corrosion in that part.

PG&E's Response:

Notification #114212581/PM #43251462 was created to rewrap the riser. The riser rewrap is scheduled to be completed by the end of February 2018. Please see attached "Belshaw_PM43251462.pdf" for a copy of the work ticket.

Later PG&E has sent the picture with rewrap.

SED's Conclusion:

PG&E has taken corrective action.

3. CP area D47-8 ANN
42115548 - 108 Medburn Avenue, Clyde
Some atmospheric corrosion is starting to appear on meterset assembly.

PG&E's Response:

PG&E agrees with the concern and have taken the following corrective action: Order #43251461 was created to remediate the AC on the meter set of 108 Medburn Ave. The meter set was wire brushed and painted on 1/6/18 by GGL2. Please see attached file for work ticket and pictures.

SED's Conclusion:

PG&E has taken corrective action.

4. Span GT.TM.SPAC.SP3
C.C. Canal Xing on Naval WE, Concord
The pipe had sticker on one side of the span to indicate that it is a gas pipeline, but the sticker is faded. The sticker/markings is also needed on the other end of the pipe.

PG&E's Response:

PG&E agrees with the concern and have taken the following corrective action: Gas pipeline warning stickers were replaced on the SP-3 canal span outside of the Naval Weapons Station. Please see attached pictures.

SED's Conclusion:

PG&E has taken corrective action.

5. Leak

230 El Camino Corto, Walnut Creek

A leak was found on meterset assembly before the earthquake valve.

PG&E's Response:

PG&E agrees with the concern and have taken the following corrective action: The meter set leak was fixed and painted on 1/2/18 by S1W5. Please see "Gas Remarks" section for additional details on page 3 in the attached "El Camino Corto_CONF.pdf" file.

SED's Conclusion:

PG&E has taken corrective action.