

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 17, 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: 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 conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) Diablo Division (Division) on November 27-December 1, 2017. The inspection included a review of the Division's records for the period of 2014 through 2016, as well as a representative field sample of the Division's facilities in various cities. SED staff also reviewed the Division'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 particular 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 observations noted in the Summary.

If you have any questions, please contact Sikandar Khatri at (415) 703-2565 or by email at Sikandar.Khatri@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
Kelly Dolcini, 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.

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.

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.

II. 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.
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.
3. CP area D47-8 ANN
42115548 - 108 Medburn Avenue, Clyde
Some atmospheric corrosion is starting to appear on meterset assembly.
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.
5. Leak
230 El Camino Corto, Walnut Creek
A leak was found on meterset assembly before the earthquake valve.