

2017 Humboldt Division CPUC Audit Responses

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Finding Type [Internal, NOV, AOC]	Finding #	Finding	Response	Associated Attachment (File Name)
NOV - PG&E's Internal Review Findings		Prior to the start of the audit, PG&E provided SED its findings from the internal review it conducted of Humboldt 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. Table 1 lists all of the violations from PG&E's internal review.	<p>There was 1 finding from the Humboldt Division IRSF that has not been completed and requires a status update.</p> <p>Finding: Gas services disconnected by personnel with lapsed operator qualifications.</p> <p>Initial Response: Supervisors are to scan each employee's operator qualification card periodically to ensure each employee has the proper qualification to perform covered tasks. Supervisors also have communicated with employees their responsibility to ensure they have proper qualifications before performing work. Operator qualification testing is scheduled in June 2017 in Eureka.</p> <p>Updated Response: The affected employee successfully re-tested on this OQ the week of June 5th, 2017. Supervisor is monitoring work assigned to each employee on a daily basis to ensure employees are qualified to perform the work assigned to them.</p>	n/a
AOC	1	During its field verification, SED found that the two L-177A exposed spans (mile points 189.5 and 190.2) had minor coating damages. On a post inspection response dated 5/4/2017, PG&E notified SED that the coating damages have been remediated by recoating with the wax tape method and the corrective work orders for L-177A mile points 190.2 and 189.5 are 43002511 and 43002510, respectively. This note serves as a record of the observation.	As noted in SED's inspection report, the corrective actions have already been completed and provided to SED.	n/a
AOC	2	During SED's field verification on 4/27/2017, the Division conducted a leak recheck for a grade 3 leak at 2170 Hemlock Street, Eureka and upgraded the leak to grade 1 due to the short distance that the gas was detected from the residential structure. PG&E's construction crew stopped the leak and completed the repair on 4/28/2017. This note serves as a record of the observation.	As noted in SED's inspection report, the corrective actions have already been completed and provided to SED.	n/a
AOC	3	SED reviewed the Division's transmission exposed spans records and found that some of the intentional exposed spans do not meet PG&E's design standards for spans. Corrective actions are required to be completed within 39 months from the date of determination of the spans not meeting the standards. Please provide SED with a response indicating PG&E's corrective action plan and proposed remediation date for each of the exposed spans not meeting the standards. ☐	<p>The following (2) spans were identified as needing to be brought up to PG&E's design standard: L-177A MP 162.335-162.337 and L-177A MP 189.925-189.927</p> <p>The corrective remediation plan is to convert these pipe segments into "intentional spans" so that they are incorporated into our maintenance cycle for spans. In addition, we plan to bring these spans up to standards (meaning installation of a proper air-to-soil transition as well as re-coating the pipe).</p> <p>This remediation plan will be completed before the "39 months from discovery", therefore all work will be completed by Q2-2020.</p>	n/a