

2018 Lafayette CPUC Audit Responses

Finding Type [Internal, NOV, AOC]	Finding #	Finding	Response	Associated Attachment (File Name)
NOV	1	<p>1. Title 49 CFR §192.605(a) states in part: "Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response."</p> <p>PG&E procedure TD-4540P-01, Section 1.3 under Preliminary Maintenance Steps, states in part: "6. Ensure accuracy of both station diagram copies..."</p> <p>During records review of pressure regulating stations, SED observed that Regulator Station RW-38 had a mapping error. The Operating Diagram labeled a Pilot Operated Regulator (Regulator R10) as a Valve. PG&E has issued a Corrective Action Plan (CAP) to correct the Operating Diagram to correctly indicate R10 as a Regulator (CAP Notification Number: 114898249 on 8/13/2018).</p>	<p>The operating diagram has been updated, please find a copy attached 'Updated Operating Diagram_CONF.pdf'</p>	<p>114898249 - Updated Operating Diagram_CONF.pdf</p>
NOV	2	<p>2. Title 49 CFR §192.707(a) states in part: "Buried pipelines...a line marker must be placed...(2) Wherever necessary to identify the location of the transmission line or main to reduce the possibility of damage or interference."</p> <p>PG&E procedure TD-4412P-09, Section 1.3 under Pipeline Marker Requirements, states in part: "Install markers within line of sight of one another (by the unaided eye)."</p> <p>During field inspections at Las Trampas Creek - Geohazard site B-1, SED observed that PG&E is not maintaining line of sight at the location, as there was only one visible pipeline marker. PG&E does not have any visible pipeline markers at Las Trampas Creek - Geohazard site A-1. PG&E has issued a CAP to install new pipeline markers (CAP Notification Number: 114896872 on 8/16/2018).</p>	<p>CAP #114896872 has been created to install additional markers along this line, including at the location identified during the field inspections. The planned locations are plotted in the attached document '114896872 - Line marker locations_CONF.pdf' (marked A-N with the blue post its). The installations have begun and are expected to be completed by the end of 2018.</p>	<p>114896872 - Line marker locations_CONF.pdf</p>