

2018 Gas Storage SED Inspection Responses

Finding Type [Internal, NOV, AOC]	Finding #	Finding	Response	Associated Attachment (File Name)
NOV - PG&E's Internal Review Findings	1 - 5	<p>At the start of the inspection, PG&E provided SED its findings from the internal review it conducted of Gas Storage. 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), §192.605(a). SED is aware that PG&E began remediation of all its findings prior to SED's inspection. Table 1 lists all of the violations from PG&E's internal review.</p> <p>Table 1: Findings from PG&E's Internal Review Code / Finding / (Instances)</p> <p>192.605(a) / Pressure limiting valves went beyond the 45 day compliance timeframe outlined in TD-4545S / (23)</p> <p>192.605(a) / Pressure relief valve capacity not recalculated as outlined in H-70 / (8)</p> <p>192.743(a) / Missed annual review of relief valve capacity calculation / (6)</p> <p>192.805(b) / Valve maintained by individual without proper qualifications / (1)</p> <p>192.731(b) / Defective pressure relief valve in a compressor station was not promptly repaired or replaced / (1)</p>	<p>All internal review findings were addressed and corrective actions outlined within the Internal Review Summary of Findings (IRSF) provided in pre-inspection data request GS#02.</p>	
NOV	1	<p>1. Title 49 CFR §192.481(a) states: "Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows: Onshore - At least once every 3 calendar years, but with intervals not exceeding 39 months"</p> <p>During record review of exposed spans in McDonald Island, SED discovered nine McDonald Island exposed spans originally inspected for atmospheric corrosion on 2/10/2015 with subsequent inspection dates listed in Table 2 below.</p> <p>Table 2: Exposed Spans Inspection Dates Equipment ID Subsequent Inspection</p> <p>49932222 6/6/2018 49932224 6/6/2018 49932225 6/6/2018 49932226 6/6/2018 49932227 6/6/2018 49932228 6/6/2018 49932220 Removed from Spans List 6/12/2018 49932223 Removed from Spans List 6/12/2018 49932221 Removed from Spans List 6/12/2018</p> <p>Because the nine spans were last inspected on 2/10/2015, the next inspections were due by 5/10/2018. PG&E failed to complete an atmospheric corrosion inspection of these spans within the required 39 month interval.</p>	<p>PG&E recognizes that the 39 month maximum duration between span inspections was exceeded. A scheduling discrepancy that resulted from the transition of electronic work management systems (PLM to SAP) has been resolved. All nine McDonald Island exposed spans inspected for atmospheric corrosion on 02/10/2015 were revisited as of 06/06/2018. Note that three of them no longer classify as spans: 2 were removed when a portion of L-57A was retired and 1 is now fully covered; these have been removed from the span list.</p> <p>The following action has been taken to avoid reoccurrence: - SAP work management system has scheduled span re-inspection notifications to automatically alert corrosion supervisor of upcoming deadline(s).</p>	Att 01 - Span Records_CONF
AOC	1	<p>1. During the field verification of pipe-to-soil readings, SED noted a low pipe-to-soil reading (outside the -850mV requirement) at the following location.</p> <ul style="list-style-type: none"> Turner Cut Station Mainline at end of vault: -789mV <p>Please provide to SED what PG&E plans to do to address this issue.</p>	<p>PG&E generated a troubleshoot (notification# 114704855) for the unsatisfactory CP reading after initial identification, and is now targeting resolution no later than the end of Q4 2018 (corrective notification # 114690834).</p>	