

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 22, 2020

GI-2019-11-PGE-29-07

Ms. Christine Cowsert, VP
Gas Asset Management and System Operations
6121 Bollinger Canyon Road
San Ramon, CA 94583

SUBJECT: General Order (GO) 112-F Gas Inspection of PG&E's Operator Qualification Program

Dear Ms. Cowsert:

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) Operator Qualification Program between November 4-8, 2019.

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 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 concerns 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 "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: Susie Richmond, PG&E Gas Regulatory Compliance
Vincent Tanguay, PG&E
Claudia Almengor, SED
Terence Eng, SED

Summary of Inspection Findings

Dates of Inspection: November 4-8, 2019

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: Operator Qualification Program

Assets (Unit IDs): Main Office (Specialized Inspections) (86283)

System Type: GT

Inspection Name: PG&E Operator Qualification

Lead Inspector: Sikandar Khatri

Operator Representative: Rosa Duenas

Unsatisfactory Results

Training and Qualification : Qualification of Personnel - Specific Requirements (TQ.QU)

Question Text Does the process require individuals who oversee and perform marking, trenching, and backfilling operations be qualified?

References 192.805(b) (ADB-06-01, 192.801, 192.328)

Assets Covered Main Office (Specialized Inspections) (86283 (29))

Issue Summary 192.801(b) states:

For the purpose of this subpart, a covered task is an activity, identified by the operator, that:

- (1) Is performed on a pipeline facility;*
- (2) Is an operations or maintenance task;*
- (3) Is performed as a requirement of this part; and*
- (4) Affects the operation or integrity of the pipeline.*

GO 112-F section 105 Definitions states:

Covered Task means those tasks defined by 49 C.F.R §192.801, but also includes "new construction" in the federal definition of "covered task." Accordingly, the commission defines a covered task that will be subject to the requirements of 49 CFR §§ 192.803 through 192.809 as an activity, identified by the Operator, that:

- (a) Is performed on a gas pipeline;*
- (b) Is an operations, maintenance, or new construction task;*
- (c) Is performed as a requirement of 49 CFR, Part 192; and*
- (d) Affects the operation or integrity of the gas pipeline.*

SED found PG&E in violation of 192.801(b) and GO 112-F section 105. SED observed that there are no covered tasks for excavation activities, such as excavating, drilling, boring, backfilling, and compacting both for "Operation and Maintenance" and "New Construction". Excavation activities meet the covered tasks criteria as per the 4 part test in 192.801(b).

Concerns

Training and Qualification : Operator Qualification (TQ.OQ)

Question Text Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?

References 192.805(a) (192.801(b))

Assets Covered Main Office (Specialized Inspections) (86283 (29))

Issue Summary SED observed that OQ task (OQ-0207 Pipeline Replacement) has a broader title that does not reflect the description of the task. PG&E mentioned that this was developed for a special situation (for Rancho Cardova incident). PG&E should review it for its applicability and make it more clear and relevant. In case, it is decided to deactivate it, complete justification must be developed outlining the reasons showing that what other OQ tasks cover the intent of OQ-0207.

In addition, documentation of all meetings including changes in OQ plan, development of new tasks, deactivating tasks and changing/merging tasks should be kept.

Question Text Are evaluation methods established and documented appropriate to each covered task?

References 192.805(b) (192.803, 192.809(d), 192.809(e))

Assets Covered Main Office (Specialized Inspections) (86283 (29))

Issue Summary PG&E's OQ Task List specifies three types of methods of evaluation; 'Written', 'Performance' and 'Oral and Performance'. PG&E procedure TD-4008S, section 2.2(3) identifies two methods of evaluation i.e. "Written" and "Performance", the latter method need to have oral knowledge component. It is understood from PG&E that all tasks with "Performance" type of evaluation have an "Oral" component also. Therefore, in order to be consistent, the "OQ task list" should also have only two methods of evaluation, i.e. "Written" and "Oral and Performance", or as appropriate.

Question Text Does the process require significant OQ program changes to be identified and the Administrator or State agency notified?

References 192.805(i)

Assets Covered Main Office (Specialized Inspections) (86283 (29))

Issue Summary SED recommends that PG&E define significant changes to the OQ program in TD-4008S. Advisory bulletin ADB-09-03 defines significant changes to the OQ plan as including but not limited to the elimination of covered tasks, changes in the evaluation methods or criteria for performing covered tasks, increases in the number of non-qualified individuals who may perform a covered tasks while being directed and observed by a qualified individual, and wholesale changes made to an OQ plan or program. SED observed during the inspection that some changes to the OQ plan that fit the definition of significant from ADB-09-03 were made since the last notification of changes to the OQ plan sent to the CPUC in March of 2017. OQ-0615 was retired on 1/10/18. Effective 1/1/19 the span of control for OQ tasks OQ-0211, OQ-0212, OQ-0213, OQ-0214, and OQ-0216 was increased from 1:1 to 1:3. SED recommends that PG&E consider adding the definition of significant changes from ADB-09-03 and report any future relevant changes as required by §192.805(i).

Training and Qualification : Qualification of Personnel - Specific Requirements (TQ.QU)

Question Text Does the process require taps on a pipeline under pressure (hot taps) to be performed by qualified personnel?

References 192.627 (192.805(b))

Assets Covered Main Office (Specialized Inspections) (86283 (29))

Issue Summary There is no consistency on the operating qualification requirements in hot tapping procedures. For example, procedures C-16.2, C-15.2, and TD-4150P-190 either do not have OQ requirements per TD-4008S or lack the correct OQ task code. All procedures should reference TD-4008S for Operator Qualification requirements to remain consistent.

Training and Qualification : Qualification of Personnel - Specific Requirements (O and M Construction) (TQ.QUOMCONST)

Question Text Does the process require welders to be qualified in accordance with API 1104 or the ASME Boiler & Pressure Vessel Code?

References 192.227(a) (192.225(a), 192.225(b), 192.328(a), 192.328(b), 192.805(b))

Assets Covered Main Office (Specialized Inspections) (86283 (29))

Issue Summary PG&E has OQs for Welder Qualifications; for example 3203A and 3203B (and others related to Welding). SED understands from PG&E that 'A' refers to welders taking initial qualification (with destructive testing) and 'B' refers to requalification where weld is tested using Non-destructive Testing (NDE). However, the description for 'B' parts in OQ tasks is not clear, for example it says, "This task includes welding using Non-Destructive Examination (NDE)". This indicates that welding is being done using NDE, however, to SED's understanding from PG&E is that the requalification weld is tested using NDE. The language should be clarified.

Question Text Does the process require that persons who inspect joints in plastic pipes be qualified?

References 192.287 (192.805(b))

Assets Covered Main Office (Specialized Inspections) (86283 (29))

Issue Summary PG&E gas design standard D-34: Qualification for Joining Polyethylene Pipe, subsection 3 of the General Requirements for the Qualification of Personnel Joining Polyethylene Pipeline section establishes requirements for qualification and training for persons carrying out the inspection of plastic pipes:

"No person may carry out the inspection of plastic pipes required by Code of Federal Regulations (CFR) Title 49, Transportation, Part 192—Transportation of Natural and other

Gas by Pipeline: Minimum Federal Safety Standards, Subpart F, "Joining of Materials Other Than by Welding," section (§) 192.237, subsection (c), and § 192.285, subsection (b), unless that person has been qualified by appropriate training or experience in evaluating the acceptability of plastic pipe joints made according to the applicable joining procedure."

CFR Title 49 §192.287 states, "No person may carry out the inspection of joints in plastic pipes required by §§192.273(c) and 192.285(b) unless that person has been qualified by appropriate training or experience in evaluating the acceptability of plastic pipe joints made under the applicable joining procedure."

GO 112-F section 105 Definitions states:

Covered Task means those tasks defined by 49 C.F.R §192.801, but also includes "new construction" in the federal definition of "covered task." Accordingly, the commission defines a covered task that will be subject to the requirements of 49 CFR §§ 192.803 through 192.809 as an activity, identified by the Operator, that:

- (a) Is performed on a gas pipeline;*
- (b) Is an operations, maintenance, or new construction task;*
- (c) Is performed as a requirement of 49 CFR, Part 192; and*
- (d) Affects the operation or integrity of the gas pipeline.*

Based upon the definition of covered task in GO 112-F, inspection of joints in plastic pipe is a covered task and should require operator qualifications to perform during operations, maintenance, and new construction activities. PG&E's requirements in D-34 closely mimics CFR Title 49 §192.287 which does not require operator qualification for the inspection of plastic pipe. SED recommends that section 3 of gas design standard D-34 be rewritten to make it clear that operator qualifications are required for the inspection of plastic pipe connections.

Also, the referenced subsection of D-34 references §192.237. §192.237 does not exist. The reference should be to §192.273.