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November 27, 2019

Mr. Dennis Lee  
Gas Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Re: State of California – Public Utilities Commission  
General Order 112-F Gas Inspection of PG&E's Yosemite Division

Dear Mr. Lee:

The Safety and Enforcement Division (SED) of the CPUC conducted a General Order 112F inspection of PG&E's Yosemite Division from 09 to 20-Sep-2019. On October 31, 2019, the SED submitted their inspection report, identifying violations and findings. Attached is PG&E's response to the CPUC inspection report.

Please contact Justin Leany at (415) 603-9552 or [justin.leany@pge.com](mailto:justin.leany@pge.com) for any questions you may have regarding this response.

Sincerely,

/s/ Vincent Tanguay  
Director, Regulatory Compliance Gas Operations

Attachments: Responses to post-inspection written preliminary findings

cc: Terence Eng, SED  
Kai Cheung, SED  
Claudia Almengor, SED  
Vincent Tanguay, PG&E  
Susie Richmond, PG&E  
Justin Leany, PG&E

2019 Yosemite Division (D) SED Inspection Responses

#	Finding Type	Topic	Code Reference	SED Finding	PG&E Response	Associated Attachment (File Name)
1.1	Unsatisfactory Results	Records: Operations and Maintenance (PRR.OM)	192.709(c) (192.743(a), 192.743(b), 192.(c))	<p>Title 49 CFR §192.605(a) states: "Procedural manual for operations, maintenance, and emergencies. (a) General. 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><u>PG&amp;E's Gas design standard H-70, Pressure relief devices, section "Detailed Process for Inspection and Review" states:</u> "37. The following steps must be completed by local engineering personnel within 30 days of a follow-on operation being generated... E. If a new calculation review form is created, local engineering must forward the completed calculation review form and supporting documents to the local maintenance personnel..."</p> <p>During review of regulator station records for HPR RC 04, the relief valve calculation sheet in 2016 indicated lowering the setpoint to 50 psi from 55. However, the records show the setpoint was maintained at 55 psi for years 2017-2019. Additional regulator stations with similar setpoint calculations: HPR RD-15, OAK HP 45, OAK HP 43, OAK HP 38, N HP 24, HP 07 Canal School Rd &amp; HW 33.</p>	<p>Regulator station datasheets have been reviewed and updated to assure alignment with relief valve set points established by the relief valve calculations observed within each station binder (Att-01).</p> <p>To avoid reoccurrence, a refresher training to confirm the relief valve set point(s) from the datasheet align with the relief valve calculation was provided, increasing awareness and communication amongst staff. (Att-02).</p>	<p>Att-01 - Updated Reg. St. Data Sheets - Relief set point_Redacted.pdf</p> <p>Att-02 - Training Tailboard.pdf</p>
1.2	Unsatisfactory Results	Records: Operations and Maintenance (PRR.OM)	192.287 (192.807(a), 192.807(b))	<p>Title 49 CFR §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."</p> <p>SED reviewed OQs for individuals (YO#56) who performed plastic joining in selected leak repair (YO#54). SED found that, in the construction project for SGO Capacity Franklin Street Escalon (Order No. 31095008) on 8/11/2016, LAN ID MASA was listed on the as-built drawing as the plastic fusion inspector. Upon further research, it was found that MASA did not possess the required OQ, 21-01 Polyethylene Pipeline Connection Inspection.</p>	<p>The plastic fusions for the 2016 project (# 31095008) were performed and self-inspected by the employee with LAN ID R7C5. R7C5 possessed all applicable OQs covering the preparation, installation and inspection of plastic fusion for this project (Att-03). The project foreman's LAN ID (MASA) was incorrectly listed in the "Inspected by" field underneath where R7C5 was listed for the "Fusion by" field. It is recognized the record may give the impression that MASA was qualified, when instead R7C5 self-inspected his work therefore should have also been listed in the "Inspected by" field as well.</p> <p>Clarification that only qualified people should endorse such signoffs was provided to R7C5 and MASA at their next Operator Qualification Annual Review (GAS-0134VL) on 15-Dec-2016. This clarification method was proposed and accepted by SED within the closure letter following the 2015 SED Inspection of Operator Qualifications.</p>	<p>Att-03 - OQ Transcript for R7C5.xlsx</p>
1.1	Concerns	Records: Operations and Maintenance (PRR.OM)	192.709(c) (192.739(a), 192.739(b))	<p>Stations DR RB-15, DR RA-24, and DR RB-61 have regularly had issues with achieving lock up. During this inspection, SED observed on 9/16/19 that the left run regulator and monitor of station DR RA-24 failed to lock up. SED is concerned that while lock up is always achieved after maintenance, there may be underlying issues that are not being addressed and the stations will continue to have problems achieving lock up.</p>	<p>Following SED field observations, a non-destructive examination (NDE) was conducted of station components (Att-04). The examination revealed some loose debris that is now removed from the system (Order# 43957949).</p>	<p>Att-04 - NDE of DR RA-24_Redacted.pdf</p>
2.1	Concerns	Pipeline Field Inspection: Pipeline Inspection (Field) (FR.FIELDPIPE)	192.351 (192.355(a), 192.355(b), 192.355(c))	<p>SED observed two service regulators that were missing a screen to protect the regulator vent from insects and other blockage: - ETS location at equipment ID 42071064, 11th St N/O Alley in Firebaugh - ETS location at equipment ID 44317823, Lynn &amp; Merced in Dos Palos</p>	<p>These observations were communicated to our Field Services group and tracked via field activity numbers: - Firebaugh location: #7351472918 - Dos Palos location: #7501573007 Both items have now been corrected.</p>	
2.2	Concerns	Pipeline Field Inspection: Pipeline Inspection (Field) (FR.FIELDPIPE)	192.465(a) (192.463(b), 192.463(c))	<p>During the field verification of pipe-to-soil readings, SED noted six low pipe-to-soil readings (outside the -850mV requirement) at the following locations:</p> <ol style="list-style-type: none"> <li>1) Chowchilla (equipment# 44354689 ) ETS read of -809mV</li> <li>2) Firebaugh (equipment# 44381205) ETS read of -827mV</li> <li>3) Newman (equipment# 42821909) isolated steel read of -255mV</li> <li>4) Turlock (equipment# 42822053) isolated steel read of -550mV</li> <li>5) Modesto (equipment# 44331802) ETS read of -831mV</li> <li>6) Modesto (equipment# 44331800) ETS read of -494mV</li> </ol>	<p>The inadequate reads were addressed through corrective actions summarized below:</p> <ol style="list-style-type: none"> <li>1) Rectifier adjusted, follow up read was -862mV (Notif# 118185499)</li> <li>2) Rectifier adjusted, follow up read was -1028mV (Notif# 118186100)</li> <li>3) New drivable anode installed; read at service was -1545mV (Notif# 117907013)</li> <li>4) Riser replaced (plastic), no longer isolated steel (project# 43978428)</li> <li>5) New deep well installation powered up, follow up read was -1464mV (Notif# 117901234)</li> <li>6) New deep well installation powered up, follow up read was -1419mV (Notif# 117901230)</li> </ol>	