

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



January 30, 2018

Jimmie Cho, Senior Vice President  
Gas Operations and System Integrity  
Southern California Gas Company  
555 West 5<sup>th</sup> Street, GT21C3  
Los Angeles, CA 90013

**GI-2017-12-SCG64-02ABC**

**Subject: General Order (G.O.) 112-F Comprehensive Operation and Maintenance Inspection of Southern California Gas Company's Inland East Distribution Area**

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112-F Comprehensive Operation and Maintenance Inspection of Southern California Gas Company's (SCG) Inland East Distribution Area (Inspection Unit) on December 11-15, 2017. SED's staff used Pipeline and Hazardous Material Safety Administration's (PHMSA) Inspection Assistant (IA) protocols as a reference guideline. The inspection included a review of the Inspection Unit's leak survey and patrolling records for calendar years 2013 to 2016, cathodic protection (CP) records for calendar years 2015 to 2016, M&R and critical valves records for calendar year 2016, and field inspections of pipeline facilities in the Corona, Fontana, Chino, and Azusa districts. Also, SED's staff reviewed the Inspection Unit's Operator Qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED's staff identified two violations and had two areas of concern which are described in the enclosed "Summary of Inspection Findings".

Please provide a written response within 30 days of your receipt of this letter indicating the measures taken by SCG to address the probable violations and observations noted in the Summary of Inspection Findings.

If you have any questions, please contact Michelle Wei, at (213) 620-2780 or by email: miw@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Kenneth A. Bruno".

Kenneth Bruno  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

CC: Michelle Wei, SED/GSRB  
Troy Bauer, Sempra  
Kan Wai Tong, SED/GSRB  
Kelly Dolcini, SED/GSRB

**Summary of Inspection Findings  
2017 SCG Inland East Distribution Inspection  
December 11-15, 2017**

**I. SED Identified Probable Violations**

**1. Title 49 CFR Part 192 §192.13 – What general requirements apply to pipelines regulated under this part?**

*“(c) Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.”*

**SCG’s Gas Standard 187.0175 – Inspection and Testing of Welds on Company Steel Piping §4.4.2**

*“All welds performed on pipeline operating above 60 psi shall be visually inspected by a qualified Company representative or contract welding inspector, as per Section 9 of API 1104.”*

During the review of the Project Weld Inspection Report of construction project, 12” High Pressure Gas Relocation in La Cadena Drive, Colton, CA (work order # 81704), SED staff noted that the Inspection Unit failed to follow its own procedure by not visually inspecting the following 28 welds in 2013:

Weld Numbers 103, 27, 12, 94, 89, 88, 84, 99, 98, 95, 96, 97, 26, 25, 1, 2, 3, 4, 5, 15, 6, 7, 8, 9, 10, 11, 28, and 13.

Therefore, SCG is in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, Section §192.13(c) for its failure to follow SCG’s Gas Standard 187.0175 Section 4.4.2.

**2. Title 49 CFR Part 192, Section 192.465(a) – External Corrosion Control: Monitoring**

*“Each pipeline that is under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months... However, if tests at those intervals are impractical for separately protected short sections of mains or transmission lines, not in excess of 100 feet (30 meters), or separately protected service lines, these pipelines may be surveyed on a sampling basis. At least 10 percent of these protected structures, distributed over the entire system must be surveyed each calendar year, with a different 10 percent checked each subsequent year, so that the entire system is tested in each 10-year period.”*

During record review, SED noted that the Inspection Unit did not conduct Cathodic Protection monitoring survey for four service lines which are under separate cathodic protection (CP) systems that are required to be cathodically surveyed every 10 years pursuant to Part 192 Section 192.465(a). See the following table for further information.

<b>Service ID</b>	<b>Address</b>	<b>City</b>	<b>Date last inspected</b>	<b>Date inspected</b>
00427526	725 La Crosse	Glendora	4/11/2005	12/20/17
02433177	549 Glenwood	Glendora	3/23/2005	12/20/17
01185588	1244 E St	Corona	8/25/2005	12/20/17
03883722	1499 Pomona Rd	Corona	8/23/2005	12/20/17

In 2005, an SCG' CP technician tested these four service lines and found them within tolerance. In 2015, another CP technician labeled these service lines as "replaced by plastic". When SED requested the service history, the Inspection Unit found that these service lines had not been replaced and immediately sent a technician to the locations to test the service lines. All of the lines were tested on December 20, 2017 and are within tolerance. However, the Inspection Unit did not survey these assets within the required time frame, therefore, SCG is in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, Section §192.465(a). SED also strongly recommends that the Inspection Unit review all of its CP10 inspections performed in 2015 to prevent recurrence of identical issues elsewhere.

## **II. SED's Concerns and Recommendations**

1. During the review of the Project Weld Inspection Report of construction project, 12" High Pressure Gas Relocation in LA Cadena Drive, Colton, CA (work order # 81704), SED noted that the Inspection Unit failed to follow its own Welding Procedure Specification WPS-API-SMAW6A. WPS-API-SMAW6A requires two welders to butt weld on pipes with diameters greater than or equal to 12.75". However, according to the Project Weld Inspection Report dated 2013 for work order # 81704, 64 butt welds were performed with only one welder on a 12.75" pipe. The Inspection Unit informed SED that this was a typo and that the welding procedure should say that one or two welders are permitted. SED is aware of SCG's Gas Standard 187.0055 which states in Section 4.10.1 that "One welder may be used for 12" butt welds or branch connections with no evident strains." However, SED is concerned that the welding procedures were not followed as written.
  
2. During field inspections, SED noted that an SCG's employee failed to perform a leak test with a glove on his combustible gas indicator (CGI) before using it to test a valve casing during a valve inspection. Upon SED's request, the employee performed the test and the CGI did not pass the test. The Inspection Unit brought another CGI device in order to perform the test and no leaks were found. However, it is important for an employee to check the functionality of the CGI device prior use to ensure that it can properly detect a gas leak before or after the valve inspection. Therefore, SED recommends that the Inspection Unit ensure that its employees only use functional equipment to perform all maintenance inspections.