

## Khatri, Sikandar

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**From:** Deniston, Laurence <LCD1@pge.com>  
**Sent:** Thursday, February 05, 2015 11:43 AM  
**To:** Khatri, Sikandar  
**Subject:** FW: Index 6054.03, .04, .05 Supp01(DUE ASAP) : SRCR - DFM-1601-09, Tracy (Reported on December 9, 2014)

Sikandar,

Please find additional information regarding the referenced safety-related condition report.

**QUESTION 6054.03:** What actions are being taken or planned for overall PG&E system to identify similar issues at other location where similar circumstances such as girth weld near miter bends and others conditions exist?

**RESPONSE 6054.03:** PG&E is compiling a response to this question and will provide to the CPUC as soon as possible.

**RESPONSE 6054.03 Supp01:** In addition to the Integrity Management assessments performed on all HCA locations, PG&E also has assessments specific to cased crossings. All transmission cased pipeline crossings are monitored on an annual basis for electrical isolation in alignment with 49 CFR §192.467. If a casing contact is detected from the annual electrical survey, the location is risk ranked, prioritized and mitigated based on highest risk. The mitigation consists of exposing either end of the casing, inspecting and repairing the pipeline for any defects, clearing the electrical short, and creating a non-corrosive environment inside the casing annulus.

Please note, PG&E does not have a program specific to evaluating features on pipelines, such as girth welds near miter bends, however, these features are welding/fabrication related and managed as part of the Construction Threat. The Construction Threat is monitored and mitigated as part of the Transmission Integrity Management Program.

**QUESTION 6054.04:** Is the Transmission Line DFM-1601-09 part of integrity assessment program? Has any integrity assessments been carried out or planned? Please provide the results of integrity assessments that has been carried out, if any.

**RESPONSE 6054.04:** PG&E is compiling a response to this question and will provide to the CPUC as soon as possible.

**RESPONSE 6054.04 Supp01:** DFM 1601-09, from Mile Point (MP) 0.0 to MP 0.47, is located in a High Consequence Area (HCA) identified in 2004 and is part of PG&E's Transmission Integrity Management Program. This MP range of the pipeline was assessed using External Corrosion Direct Assessment (ECDA) in 2006/2007. Reassessment using ECDA was performed in 2014.

The 2006/2007 ECDA assessment of the HCA MP range identified scheduled indications on the non-cased pipe and an indication of a electrolytic short between the cased pipe and the carrier pipe at MP0.42. The scheduled indications were identified over a length of 283 feet of the 0.47 miles assessed near MP 0.27-0.33, approximately 735 feet away from the casing end. In response to the scheduled indication findings of the 2006/2007 ECDA assessment, PG&E adjusted the cathodic protection level to mitigate the moderate external corrosion. The possible electrolytic short did not require immediate action per ECDA procedure and was regularly monitored as part of the casing remediation project described in the response to Q3 that subsequently identified the corrosion pitting noted in the Safety Related Condition Report.

During the 2014 ECDA assessment, no indications were reported for the entire mile point range. Although the cased pipeline was reported to be possibly electrolytically shorted to the casing pipe in the 2006/2007 assessment, the 2014 assessment did not show indications of a short in the assessment.

PG&E will continue to monitor this cased pipeline during annual isolation testing. If there are any indications of a potential short during future monitoring, PG&E will perform additional testing to confirm and, if necessary, follow the casing mitigation process described in the response to Q3.

**QUESTION 6054.05:** Please provide any additional relevant information.

**RESPONSE 6054.05:** PG&E is compiling a response to this question and will provide to the CPUC as soon as possible.

**RESPONSE 6054.05 Supp01:** PG&E does not have any additional relevant information to provide at this time.

Sincerely,

**Larry Deniston**

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**From:** CPUCGASrequest  
**Sent:** Monday, December 22, 2014 3:16 PM  
**To:** GT&D GE Regulatory Support & Analysis  
**Subject:** FW: Safety Related Condition Report - Transmission Line DFM-1601-09, Tracy (Reported on December 9, 2014)

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**From:** Khatri, Sikandar  
**Sent:** Monday, December 22, 2014 3:15:29 PM (UTC-08:00) Pacific Time (US & Canada)  
**To:** CPUCGASrequest  
**Cc:** Lee, Dennis M.; Cauguiran, Aimee; Bruno, Kenneth; Deniston, Laurence; Berg, Lawrence; Allen, Glen  
**Subject:** Safety Related Condition Report - Transmission Line DFM-1601-09, Tracy (Reported on December 9, 2014)

Good afternoon,

I am writing to follow up on the above referred "Safety Related Condition", and will appreciate your response on the following:

(1) The condition was discovered on August 19, 2014 and this report was submitted to PHMSA and CPUC on December 9, 2014. Title 49 Code of Federal Regulations §191.25 requires that 'Safety Related Condition' must be reported no later 10 working days after the day a representative of the operator discovers the condition. It will be helpful to know the reason for late submission of the report.

(2) The submitted report states that, " Several corrosion pits were observed on the 6-inch diameter DFM-1601-09 pipeline at mile point 0.42. The pipeline was exposed at this location for a casing remediation project. The deepest corrosion pit measured 41% wall loss and was near a girth weld for a mitered bend. "

Please let us know that is there any "Root Cause Analysis" performed or planned? Please provide a copy of the same if it has been done.

(3) What actions are being taken or planned for overall PG&E system to identify similar issues at other location where similar circumstances such as girth weld near miter bends and others conditions exist?

(4) Is the Transmission Line DFM-1601-09 part of integrity assessment program? Has any integrity assessments been carried out or planned? Please provide the results of integrity assessments that has been carried out, if any.

(5) Please provide any additional relevant information.

Thanks

Sincerely,

Sikandar Khatri, Ph.D., P.E.  
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