

2016 Diablo Division Audit Findings and Responses

Finding Type [Internal, NOV, AOC]	Finding #	Finding	Response	Associated Attachment (File Name)
PG&E's Internal Review Findings		At the start of the inspection, PG&E provided SED its findings from the internal review it conducted of the Division. 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.	Per the attached summary of PG&E's Diablo Division Internal Review, there were 7 findings noted by SED from PG&E's internal review findings. All corrective actions related to these findings were completed prior to the start of the audit. Attached, please find attachment 1 - "Diablo Division Internal Review".	Atch 1_ Diablo Division Internal Review.pdf
NOV	1 (i)	<p>Title 49 CFR §192.605(a) states: "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>PG&E Procedure TD-4540P-01 requires calibration dates of test gauges used during regulator station maintenance to be documented. During its records review, SED found instances where the Division did not document dates of gauge calibration, but instead documented the dates that the gauges would be due for another calibration. Two examples are shown below. During the inspection, PG&E's document owner for this procedure agreed with SED's interpretation of this procedure.</p> <ul style="list-style-type: none"> • RW-34 Reliez Valley Regulator Station was maintained on 8/24/2016. The Division incorrectly listed the calibration due date, 11/19/16, as the actual calibration date on the pressure recorder chart. • RA-34 Point of Timber Regulator Station was maintained on 7/13/2016, The Division incorrectly listed the calibration due date, 10/23/2016, as the actual calibration date on the pressure recorder chart. 	<p>PG&E Procedure TD-4540P-01 "Maintenance of Regulator Stations", requires the serial number and the calibration dates of test gauges used during regulator station maintenance to be documented. The I&R Technician mistakenly recorded the calibration due date instead of the calibration date of the test gauge used during the regulator station maintenance in these two instances. It was confirmed during the SED inspection that both test gauges used during maintenance were calibrated as required. Attached, please find attachment 2 - "RW-34 Calibration Docs" and attachment 3 - "RA-34 Calibration Docs".</p> <p>To prevent recurrence, the supervisor tail boarded the Instrument and Regulation personnel to reinforce the requirement to document the calibration dates of test gauges, and not the calibration due date, used during regulator station maintenance per TD-4540P-01. Attached, please find attachment 4 - "Calibration Date Tailboard Redacted".</p>	Atch 2_RW-34 Calibration Docs.pdf Atch 3_RA-34 Calibration Docs.pdf Atch 4_Calibration Date Tailboard_Redacted.pdf
NOV	1 (ii)	<p>PG&E Procedure TD-4430P-02 requires power gas self-contained relief valves to be maintained during regulator station maintenance. During its records review, SED found a regulator station where the power gas self-contained relief valve was not maintained during the annual regulator station maintenance. This regulator station is listed below.</p> <ul style="list-style-type: none"> • Clayton RCV – No record of 2014 annual maintenance. 	<p>The maintenance for the Clayton Rupture Control Valve (RCV) Station power gas self-contained relief valve is performed during annual maintenance of the RCV station. In 2014, the annual maintenance for the RCV station was performed on October 31, 2014 and documented in SAP. Attached please find attachment 5 - "2014 Annual Maintenance SAP Record". While the documentation does not explicitly indicate that the power gas self-contained relief valve was maintained at this time, this is the standard practice. The power gas self-contained relief valve was maintained again in 2015 and 2016 during the annual station maintenance and documented on form TD-4430P-02-F06 "Self-contained Relief Valve Maintenance Record". Attached, please find attachment 6 - "2015 and 2016 Self-contained Relief Valve Maintenance Record".</p> <p>To prevent recurrence, the supervisor tail boarded the Instrument and Regulation personnel to reinforce the requirement to document the maintenance for the power gas self-contained relief valve on form TD-4430P-02-F06 as required per TD-4430P-02 "Gas Transmission Stations Inspection, Testing and Maintenance Procedures". Attached, please find attachment 7 - "Self-Contained Relief Valve Maintenance Record Tailboard Redacted".</p>	Atch 5_2014 Annual Maintenance SAP Record.pdf Atch 6_2015 and 2016 Self-Contained Relief Valve Maintenance Record.pdf Atch 7_Self-Contained Relief Valve Maintenance Record Tailboard_Redacted.pdf
NOV	2	<p>Title 49 CFR §192.745(a) states: "Each transmission line valve that might be required during any emergency must be inspected and partially operated at intervals not exceeding 15 months, but at least once each calendar year."</p> <p>During its records review, SED found that the Division inspected the following transmission valve at an interval exceeding 15 months.</p> <ul style="list-style-type: none"> • Valve C89 at SP3/Vine Hill Dist Reg Sta RC-39. Inspected on 5/16/2014 with next inspection on 8/18/2015, exceeding 15 months. 	PG&E respectively disagrees with this finding. Valve C-89 at SP3/Vine Hill District Regulating Station RC-39 was inspected on 5/16/2014 with the next inspection occurring on 5/13/2015. This work was confirmed as being completed on this date by the I&R technician. Attached, please find attachment 8 - "C-89 Work Tickets CONF" which were initialed and dated by the I&R technician on 5/13/2015. The requirement for operating the valve at least once each calendar year, not exceeding 15 months was satisfied. The valve was next inspected on 8/18/2015 as noted by the SED.	Atch 8_C-89 Work Tickets_CONF.pdf
AOC	1	<p>During SED's field observation of valves at Antioch Gas Terminal, SED discovered a visible leak on Valve 152. SED is aware that PG&E subsequently submitted a Work Request (Order #42882023) and will be repairing this leak.</p> <p>Please provide to SED what PG&E plans to do to address this issue and to prevent recurrence.</p>	Valve V-152 was excavated and repaired by replacing the stem packing on 2/15/17 per work order 42882023. Attached, please find attachment 9 - "V-152 Work Order and Clearance". To prevent recurrence, the Antioch Gas Terminal has semi-annual leak surveys performed in order to detect and repair leaks at all PG&E equipment and facilities at the terminal.	Atch 9_V-152 Work Order and Clearance.pdf

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AOC	2	<p>During SED's field observation at Regulator Station RA-04, SED discovered that four out of six supports were no longer providing support for station piping. PG&E could not provide any documentation to show it was aware of the issue, leading SED to believe that the supports were not inspected during annual station maintenance.</p> <p>Please provide to SED what PG&E plans to do to address this issue and to prevent recurrence.</p>	<p>Notification 11255296 and work order 42936515 have been created to repair or replace the pipe supports at the Regulator Station. Attached, please find attachment 10 - "Notification 11255296". The work order is currently in progress and two of the pipe supports have been repaired. Due to inclement weather and the need for welding on the remaining supports, the estimate for completion is 2nd quarter 2017. To prevent recurrence, the supervisor tail boarded the Instrument and Regulation personnel to confirm pipe support condition during regulator station maintenance and to generate a notification if needed. Attached, please find attachment 11 - "Pipe Support Tailboard Redacted".</p>	<p>Atch 10_Notification 11255296.pdf Atch 11_Pipe Support Tailboard_Redacted.pdf</p>