2021 San Francisco SED Inspection Responses

#	Finding Type	Topic	Code Reference	SED Finding	PG&E Response	Associated Attachment (File Name)
1	Unsatisfactory Results	Pressure Testing	192.517(b) 192.513(a) 192.513(b) 192.513(c) 192.513(d)	SED reviewed selected Leak Repair Forms and Project Records. Those records showed that PG&E did not document the temperature during the pressure test. Per §192.513 (d), during the test, the temperature of thermoplastic material may not be more than 100 °F (38 °C), or the temperature at which the material's long-term hydrostatic strength has been determined under the listed specification, whichever is greater. PG&E failed to demonstrate the compliance of this code section with their pressure testing record. The ambient temperature can be more than 100 °F in some areas, and the pressurized gas can have higher temperature than the ambient temperature. Without temperature monitoring during the pressure test, the plastic pipe could exceed 100 °F. PG&E's procedure TD-4138P-01 states that "the surface temperature for thermoplastic material must not be more than 100°F". However, TD-4138P-01 does not specify what device should be used or how to measure the pipe temperature. SED believes that PG&E should have a way of documenting the temperature during plastic pipe pressure testing to show compliance of §192.513 (d). Therefore, PG&E is in violation of §192.513 (d). SED also suggests that PG&E modify TD-4138P-01 to include the process for verifying temperature during plastic pipe pressure testing.	While PG&E understands that §192.513 (d) does not require recording of pipe temperature during test, PG&E agrees that the procedures could be improved to provide clarity regarding pipe temperature. PG&E will review its procedures to ensure the requirements are fully met.	
1	Concerns	Gas Pipeline Overpressure Protection	192.709(c) 192.739(a) 192.739(b)	For dual-run regulator station DR-198, PG&E record showed that the left run was left as working run at 50 psi in 2018, 2019 and 2020. PG&E later confirmed that it was a documentation mistake. The left run was left at 49 psi as the standby and the right run was left at 50 psi as the working run in 2019. For dual-run regulator station DR-231, the right run was left at 8.5 w.c. as the working run on 11/27/19. During the next inspection on 5/8/20, the left run was still left as the working run at 8.5 w.c. PG&E did not have any explanation on why the runs were not switched. SED suggests that PG&E be more careful on documenting maintenance records and the supervisor should review the record thoroughly before signing on the record.	Supervisor has noted the discrepancy and discussed the issue with the team of technicians in San Francisco. The Supervisor will take steps to note the working side of each regulator station to ensure equalized run-time on equipment.	
2	Concerns	Gas Pipeline Overpressure Protection	192.739(a) 192.739(b)	During field inspection on 6/22/21 at DR-198, SED observed that the above ground regulator station did not have any sign to prevent unauthorized people from entering the station. There was graffiti drawn on the fence and the pipe. PG&E said they would issue a ticket and put signs on the fence. On 6/25/21, PG&E provided the corrective action was scheduled as Notif #121593649, PM #44876316. • PG&E should update SED the progress of the corrective action and provide evidence of completion. • SED suggests PG&E take additional measurements to prevent unauthorized people from entering the station and protect PG&E's assets from vandalism.	New signs have been installed on the station fencing for DR-198. Please see attached photos. We will be assessing potential additional security measures with the appropriate department.	Att01 - DR-198_Image #1.pdf Att02 - DR-198_Image #2.pdf Att03 - DR-198_Image #3.pdf Att04 - DR-198_Image #4.pdf
3	Concerns	Atmospheric Corrosion	192.491(c) 192.481(a) 192.481(b) 192.481(c)	Because a large number of meter set assemblies (MSAs) in San Francisco are inside locked doors or gates, the Division has a significant number of MSAs that are overdue for atmospheric corrosion (AC) inspections and leakage surveys (LS). Since the issue was reported in the 2017 SED inspection of this division, PG&E has provided monthly updates on the statistics of these AC and LS "can't get in" (CGI) situations. Based on the latest update, SED acknowledges that the total number of AC and LS CGIs in San Francisco has reduced from 75,004 and 19,975 at the time when PG&E reported this issue back in 2017 to 1,218 and 9,398, respectively. SED also recognizes that the COVID-19 and Shelter-In-Place situation has made it more difficult for PG&E to reduce these AC and LS CGIs. Because many of these MSAs are inside locked doors or gates, inspecting them often requires interacting with the property owners or the public to get access to these MSAs and social distancing is sometimes not possible. Last year, PG&E had requested for waiver to extend the due dates to complete the AC and LS CGIs to minimize the potential health risk to both PG&E's workforce and the public. This waiver was granted by the Commission with Resolution M-4845 and it was effective as of November 10, 2020. While SED recognizes the challenge to completely eliminate these AC inspections and LS CGIs backlogs, SED is still concerned with the significant number of current overdue AC inspections and leakage surveys. SED is requesting PG&E to continue providing required updates on the statistics of AC and LS CGIs by divisions until resolution of this issue.	PG&E will continue updating SED on the statistics of AC and LS CGIs by divisions until resolution of this issue.	
4	Concerns	Atmospheric Corrosion	192.481(b) 192.481(c) 192.479(a) 192.479(b) 192.479(c)	On 6/24/21, SED found that at regulator station DR-227 there was atmospheric corrosion on the pipe. PG&E did not document the surface corrosion in 2020 during the regulator station inspection. SED pointed out the AC problem and PG&E said they will issue a ticket to mitigate the atmospheric corrosion. On 6/24/21, PG&E provided the corrective action ID number Notif #121594045, PM #44876480. PG&E should update SED on the progress of the corrective action and provide evidence of completion.	Notification #121594045 has been submitted for Atmospheric Corrosion. Insulation & Coating Dept. notified. Current expected completion is end of Q1, 2022.	