

2016 De Anza Division Audit Findings and Responses

Finding Type [Internal, NOV, AOC]	Finding #	Finding	Response	Associated Attachment (File Name)
NOV PG&E's Internal Review Findings	1	<p>Prior to the start of the audit, PG&amp;E provided SED its findings from the internal review it conducted of De Anza Division. Some of PG&amp;E's internal review findings are violations of PG&amp;E's standards, and are therefore violations of Title 49 Code of Federal Regulations (CFR), §192.13(c) or §192.605(a). Other lapses in keeping records necessary to administer procedures are violations under §192.603(b). The table below lists all of the violations from PG&amp;E's internal review.</p> <p>SED staff noted that some of the findings were corrected prior to the inspection. For those items not corrected prior to the inspection, please provide an update on PG&amp;E's progress to complete the corrective actions.</p>	<p>Per the attached summary of PG&amp;E's De Anza Internal Review, only 1 finding, which has been highlighted in yellow, is still awaiting remediation. PG&amp;E's Internal Review found that valve V49-I4A had been operated every year but had not been lubricated since 2011. Replacement of this valve is currently scheduled for the 3rd quarter of 2016 per Project Status Reporting System (PSRS) 42463. Attached, please find attachment 1 - "De Anza Internal Review" and attachment 2 - "PSRS 42463".</p>	<p>Att 1_ De Anza Internal Review.docx Att 2_ PSRS 42463_CONF</p>
AOC	1	<p>Abandoned Valve still on Maintenance Schedule</p> <p>During the records review, SED discovered PG&amp;E was continuing to perform annual maintenance inspections on valve V-1 on transmission line L101 at MP 9.56 although the valve was no longer connected to a live gas pipeline. PG&amp;E may want to reconsider performing annual maintenance on this valve.</p> <p>Please notify SED if/when this valve has been removed from the maintenance schedule, and confirm that any remaining pipe stub is clearly marked on all suitable pipeline maps for future reference by mark and locate crews.</p>	<p>Valve V-1 was removed from the SAP maintenance plan (schedule) per Notification 111879771 on 8/25/2016. Attached, please find attachment 3 - "V-1 Removal from Maintenance Plan".</p> <p>Valve V-1 has been deactivated in place as of June 16, 2016 and is currently scheduled for removal in the 4th quarter of 2016 per PSRS 43103. Attached, please find attachment 4 - "Deactivation Letter V-1 L-101 MP 9.56" and attachment 5 - "PSRS 4310". Valve V-2 will be removed as well.</p> <p>CAP Item 7031858 has been created to update Operating Map 384522 Sheet 1 once removal has occurred. In the interim, a redline markup has been created as part of attachment 4 - "Deactivation Letter V-1 L-101 MP 9.56".</p>	<p>Att 3_V-1 Removal from Maintenance Plan_CONF.docx Att 4_Deactivation_Letter_V-1_L-101_MP 9.56_CONF Att 5_PSRs 43103_CONF</p>
AOC	2	<p>Corrosion at Regulator Station D-12, Bascom and Curtner</p> <p>During the audit SED observed heavy atmospheric corrosion at Regulator Station D-12, also identified as DREG10654 (D-12). The underground station piping showed signs of rust and some of the vault lid hinges were completely gone. The station is located in a landscaped area that receives regular irrigation.</p> <p>PG&amp;E indicated there were projects under way to remediate corrosion at, and ultimately rebuild, this station. PG&amp;E provided a copy of the engineering scope of work to replace valves along Bascom Avenue, including one fire valve V-12 -J6J at D-12. PG&amp;E also indicated that new vault doors were on order and would be replaced soon.</p> <p>Please inform SED of the following:</p> <ol style="list-style-type: none"> <li>1) Date when new vault lids have been installed</li> <li>2) Date when fire valve V-12 -J6J has been replaced</li> <li>3) Date when remaining corrosion on station piping will be remediated.</li> </ol>	<p>All three new vault lids were replaced on 8/22/2016 per PM 41948459. Attached, please find photographs of the newly installed lids per attachment 6 - "D12-New Lids 1" and attachment 7 - "D12-New Lids 2".</p> <p>The project to replace Fire valve V-12 -J6J has been created under the gas transmission "Valve Workstream" and named "V-503" (Order Number 74006204). The dates are still being finalized, but tentatively slated to start Engineering in the 4th quarter of 2016 with Construction forecast for the 3rd quarter of 2017. A project manager and project engineer have been assigned to the project, and it has been added to the Master PMO schedule for tracking. Attached, please find attachment 8 - "0821-02 Bascom Valves Project Scoping Doc" and attachment 9 - "Ops Map 3803096_0821-02 Scope Overview".</p> <p>The corrosion on the station piping will be remediated per Notification 111886671 and Order 42772776. Expected completion is estimated in the 4th quarter of 2016. Attached, please find attachment 10 - "Notification 111886671-Order 42772776".</p>	<p>Att 6_D12-New Lids 1.jpg Att 7_D12-New Lids 2.jpg Att 8_0821-02 Bascom Valves Project Scoping Doc_CONF.pdf Att 9_Ops Map 3803096_0821-02 Scope Overview_CONF.pdf Att 10_Notification 111886671-Order 42772776_CONF.docx</p>
AOC	3	<p>Missed Valve Lubrication</p> <p>PG&amp;E's Internal Review found that valve V49-I4A had not been lubricated since 2011, with an estimated correction date of 10/31/2016. Please inform SED when the condition has been remediated.</p>	<p>PG&amp;E's Internal Review found that valve V49-I4A had been operated every year but had not been lubricated since 2011. Replacement of this valve is currently scheduled for the 3rd quarter of 2016 per Project Status Reporting System (PSRS) 42463. Attached, please find attachment 1 - "De Anza Internal Review" and attachment 2 - "PSRS 42463".</p>	