

**2016 Humboldt Division CPUC Audit Response**

Finding Type [Internal, NOV, AOC]	Finding #	Finding	Response	Associated Attachment (File Name)															
NOV - PG&E's Internal Review Findings	IRSF	Prior to the start of the audit, PG&E provided SED its findings from the internal review it conducted of Humboldt 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), §192.13(c) or §192.605(a). SED is aware that PG&E corrected some of its findings prior to SED's inspection. Table 1 lists all of the violations from PG&E's internal review.	As noted in Table 1 of SED's Inspection Report, all internal review findings have been remediated.	n/a															
NOV	1.1	<p>1. Title 49 CFR §192.605(a) states in part: "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>Utility Procedure TD-4540P-01, Section 6, Recordkeeping, states in part: "6.1 Complete paper records as outlined below OR enter information on company mobile platform developed for documenting regulator station maintenance... 4. Review data sheets during each inspection AND update as needed..."</p> <p>SED reviewed the Division's regulator station maintenance records and found that the Division failed to review and update the regulator station data sheet for Arcata Transmission Station. The maximum allowable operating pressure (MAOP) of the station outlet was incorrectly listed as 250 psig on the data sheet. The Division verified that the correct MAOP of the station outlet should be 350 psig.</p>	<p>PG&amp;E recognizes this finding and has taken the following corrective and preventative actions:</p> <p>a) The Gas Maintenance Supervisor reviewed the Station Data Sheet for Regulator Station R-45 (Arcata Transmission Station) and made corrections. The updated Station Data Sheets were put in the respective maintenance binder. Please see attachment 1, "Att 1_R45 Data Sheet LEFT RUN_CONF.pdf", and attachment 2, "Att 2_R45 Data Sheet RIGHT RUN_CONF.pdf".</p>	<p>Att 1_R45 Data Sheet LEFT RUN_CONF.pdf Att 2_R45 Data Sheet RIGHT RUN_CONF.pdf</p>															
NOV	1.2	<p>Utility Procedure TD-4430P-04, Section 18, Before Maintaining A Ball Valve, states in part: "18.5 IF a transmission change of information on an operating diagram or operating map is required, THEN submit red-line revisions to the Gas Transmission and Distribution (GT&amp;D) principal mapper."</p> <p>SED reviewed the Division's gas valve maintenance records and found that the Division failed to request for an operating map update when a transmission main line valve V-9.29 in L-126B changed its normal position from Open to Close.</p>	<p>PG&amp;E recognizes this finding and has taken the following corrective actions:</p> <p>a) CAP notification 7028208 was created for this update, and a mapping correction form was submitted to mapping. Operating Map 384114 was updated on 7/11/2016 to reflect the new operating position of V-9.29. Please see attachment 3 "Att 3_Operating Map 384114_CONF.pdf"</p>	<p>Att 3_Operating Map 384114_CONF.pdf</p>															
NOV	1.3	<p>1.3 Utility Procedure TD-4430P-04, Section 3, Maintenance Record Keeping and Review, states in part: "3.1 Maintenance personnel must perform the following tasks during each scheduled maintenance: ... 2. Log maintenance on the Valve Maintenance Record-Service History form. See Gas Utility Form TD-4430P-04-F02..."</p> <p>SED reviewed the Division's gas valve maintenance records and found that the Division failed to log the 2015 valve maintenance for each of the following four valves, listed in Table 2 below. The Division verified with its work ticket that the valve maintenances were all completed in accordance with the required frequency.</p> <table border="1" data-bbox="295 1239 932 1370"> <thead> <tr> <th>Valve Name</th> <th>Equipment Number</th> <th>Line/Station Name</th> </tr> </thead> <tbody> <tr> <td>V-12.21</td> <td>41415027</td> <td>Eureka 6" L126A at Mile Point 12.21</td> </tr> <tr> <td>V-12.61</td> <td>41415036</td> <td>Eureka 6" L126A at Mile Point 12.61</td> </tr> <tr> <td>V-A</td> <td>41422396</td> <td>Arcata 4" L137 at Mile Point 6.08</td> </tr> <tr> <td>V-B</td> <td>41422404</td> <td>Arcata 4" L137 at Mile Point 6.08</td> </tr> </tbody> </table>	Valve Name	Equipment Number	Line/Station Name	V-12.21	41415027	Eureka 6" L126A at Mile Point 12.21	V-12.61	41415036	Eureka 6" L126A at Mile Point 12.61	V-A	41422396	Arcata 4" L137 at Mile Point 6.08	V-B	41422404	Arcata 4" L137 at Mile Point 6.08	<p>PG&amp;E recognizes this finding and has taken the following corrective and preventative actions:</p> <p>a) As noted in SED's Inspection Report, the Division verified with their work tickets that the valve maintenance had been performed for each of these valves in accordance with the required frequency. Valve maintenance has also been properly documented for each of these valves since the inspection. Please see attachment 4, "Att 4_NOV-1.3 valve mtce documentation_CONF.pdf"</p>	<p>Att 4_NOV-1.3 valve mtce documentation_CONF.pdf</p>
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