

2016 Sonoma 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&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 corrected some of its findings prior to SED's inspection. Table 1 lists all of the violations from PG&E's internal review.</p> <p>SED is aware that the Division may have completed some of the items by the time of this letter. Please provide an update of the corrective status on the items that were pending as of April 8, 2016.</p>	<p>Per the attached summary of PG&E's Sonoma Internal Review, there were 3 findings, which have been highlighted in yellow, that were awaiting resolution. The requested updates to these findings have been provided on the Internal Review. Attached, please find attachment 1 - "Sonoma Internal Review" and associated attachments.</p>	<p>Atch 1_ Sonoma Internal Review.docx Atch 2_Test Record 42647936_CONF.pdf Atch 3_PM 42668474 GSR_CONF.pdf</p>
NOV	2	<p>Title 49 CFR §192.187(a) states in part:</p> <p>"Each underground vault or closed top pit containing either a pressure regulating or reducing station, or a pressure limiting or relieving station, must be sealed, vented or ventilated as follows:</p> <p>(a) When the internal volume exceeds 200 cubic feet (5.7 cubic meters): (1) The vault or pit must be ventilated with two ducts, each having at least the ventilating effect of a pipe 4 inches (102 millimeters) in diameter"</p> <p>During a field visit to the Haystack valve pit, SED discovered an underground vault exceeding 200 cubic feet with no ventilation ducts installed, therefore violating the requirement of 49 CFR §192.187(a). Additionally, the vault lids appeared difficult to operate with one person. During an emergency, the current lids would be cumbersome when the valves need to be accessed immediately. Please provide SED with an update on the remediation of this underground vault.</p>	<p>PG&E respectfully disagrees with this finding. The Haystack valve vault contains only valves. It does not contain any pressure regulating, reducing, limiting or relieving stations. Title 49 CFR §192.187(a) limits the scope of the requirements to vaults containing pressure regulating, reducing, limiting or relieving stations. Attached, please find attachment 4 - "Haystack Valve Vault." and attachment 5 - "Operating Map 384186 Rev 63". The Haystack Valve Vault has been highlighted in yellow from Operating Map 384186, indicating the valves contained in the vault.</p> <p>Work on the Haystack vault lid was completed on 9/2/16 per notification 111550825 and order 42681280. In addition to the vault lid being replaced, new springs and cross braces were also installed to improve accessibility to the vault. Attached, please find attachment 6 - "Vault Lid Replacement".</p>	<p>Atch 4_Haystack Valve Vault_CONF.pdf Atch 5_Operating Map 384186 Rev 63_CONF.pdf Atch 6_Vault Lid Replacement.pdf</p>
NOV	3	<p>Title 49 CFR §192.605(a) states in part:</p> <p>"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-4430P-04, Section 3.3, Maintenance Record Keeping and Review, states in part:</p> <p>"Maintenance supervisor, upon completion of valve maintenance, will accomplish the following:</p> <p>1. Review, within [30]-working days, each Gas Utility Form TD-4430P-04-F02, [Gas Valve Maintenance Record Form-Service History] for accuracy and completeness. Return Service History Form to personnel that performed maintenance to correct errors and omissions."</p> <p>While reviewing the Division's valve maintenance records, SED discovered multiple instances of the Division failing to review valve maintenance within the timeframe allowed by PG&E Utility Procedure TD-4430P-04. PG&E's failure to review and approve within 30 days of maintenance completion is not compliant with PG&E Procedure TD-4430P-04 and is therefore a violation of 49 CFR §192.605(a). Table 2 details valves where the Division reviewed and approved maintenance late.</p>	<p>To prevent reoccurrence, PG&E has created a Quality Control Group, specifically the Compliance Desk, that performs record reviews on 100% of completed maintenance on a monthly basis to ensure compliance, which includes supervisor review and approval being completed in a timely manner. In Sonoma, these monthly reviews of the prior month's work were first started on 2/1/2016. Please note that the Compliance Desk did not go back to review maintenance performed greater than 30 days prior to this start date or the previous year's maintenance.</p>	
NOV	4	<p>Utility Procedure TD-4540P-01, Section 7, Ensuring Compliance and Control, states in part:</p> <p>"Supervisors, responsible for proper completion of regulator station inspection, testing, and maintenance, must perform the following tasks: ... 4. Review AND approve all records for work performed at each regulator station within 30 days of completion of maintenance."</p> <p>During a review of the Division's regulator station maintenance records, SED discovered the Division never reviewed or approved maintenance performed for Regulator Station 431 (R-431) on 8/24/2015. A Division supervisor reviewed and approved the maintenance after SED brought it to attention. PG&E's failure to review and approve within 30 days of maintenance completion is not compliant with PG&E Procedure TD-4540P-01 and is therefore a violation of 49 CFR §192.605(a).</p>	<p>To prevent reoccurrence, PG&E has created a Quality Control Group, specifically the Compliance Desk, that performs record reviews on 100% of completed maintenance on a monthly basis to ensure compliance, which includes supervisor review and approval being completed in a timely manner. In Sonoma, these monthly reviews of the prior month's work were first started on 2/1/2016. Please note that the Compliance Desk did not go back to review maintenance performed greater than 30 days prior to this start date or the previous year's maintenance.</p>	

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NOV	5	<p>2.3 Utility Standard TD-4540S, Table 2, Maintenance Schedule, requires in part that Large Volume Customer (LVC) regulator set facility types must have Class A Inspections performed:</p> <p>“At least once each calendar year, at intervals not to exceed 15 months to the date of the previous Class A or Class B inspection.”</p> <p>While reviewing the Division’s regulator maintenance records, SED discovered that LVC High Pressure Regulator (HPR) sets for the Sonoma Developmental Center in Glen Ellen and the County of Sonoma in Santa Rosa were required to have an annual Class A maintenance performed, per PG&E Utility Standard TD-4540S. The HPR sets were discovered to still be on a five year inspection schedule. The Division failed to adhere to §192.605(a) when it exceeded the annual Class A inspection interval required by PG&E Utility Standard TD-4540S.</p>	<p>The Sonoma Developmental Center in Glen Ellen has its own reg station, R-712, which is currently maintained on an annual basis. This includes performing the Class A inspection. Attached, please find attachment 7 - "R-712".</p> <p>The meter set regulator for the Sonoma County Transit located in Santa Rosa has been added to PG&E's Facility Maintenance (FM) program and a Request for Work (RW) has been generated to change the maintenance cycle in SAP from a 5 year maintenance plan to annual. Annual maintenance was performed on 9/16/2016. Attached, please find attachment 8 - "Sonoma County RW and Maint Record".</p>	<p>Atch 7_R-712_CONF.pdf Atch 8_Sonoma County RW and Maint Record_CONF.pdf</p>
NOV	6	<p>PG&E Gas Valve Maintenance Record Form TD-4430P-04-F01, states in part:</p> <p>“Fill out this form completely. (DO NOT LEAVE EMPTY BLANKS OR WRITE “UNKNOWN”)”</p> <p>Furthermore, PG&E Job Aid TD-4430P-04-JA01, states in part:</p> <p>“Complete the Valve Data Section, leaving no blank items. [UNKNOWN] is not acceptable.”</p> <p>During a review of the Division’s valve maintenance records, SED discovered the valve card for regulator station R-726 lists “unknown” for valve make, model, pressure rating, and serial numbers. SED observed other instances of valve data listed as “unknown” however identified this particular valve to illustrate an example. PG&E form TD-4430P-04-F01 and Job Aid TD-4430P-04-JA01 both do not allow ‘unknown’ to be listed in the valve data section, therefore PG&E is in violation of 49 CFR §192.605(a) for not following its own procedures.</p>	<p>Since their publication on 1/1/2014, PG&E form TD-4430P-04-F01 Rev. 01 and Job Aid TD-4430P-04-JA01 Rev. 01 both allow "unknown" and "N/A" to be listed in the valve data section, with an explanation in the comments section. Attached, please find attachment 9 - "TD-4430P-04-JA01 Gas Valve Maintenance Record Job Aid" and attachment 10 - "TD-4430P-04-F01". The statement appears at the top of TD-4430P-04-F01 Rev 01 and on pages 1 and 3 of TD-4430P-04-JA01 Rev 01.</p> <p>In addition, specifications for pipeline features, such as valves, are captured in the Pipeline Features List (PFL) and PG&E’s GIS, the systems of record for MAOP-relevant information. During the MAOP Validation Project, the information from PG&E’s traceable, verifiable, and complete documents was combined with engineering analysis, any necessary conservative engineering assumptions, and field-investigations to create the PFLs.</p>	<p>Atch 9_TD-4430P-04-JA01 Rev 01 Gas Valve Maintenance Record Job Aid.pdf Atch 10_TD-4430P-04-F01 Rev 01.pdf</p>
AOC	1	<p>SED reviewed the Division’s valve records and discovered two instances of valve card information not matching valve diagram and maintenance records:</p> <p>a. Valve N-529 is listed as “closed” in valve diagram and also in maintenance sheets, however, on the valve card, its normal position is shown as “open”.</p> <p>b. Valve V-12 for regulator station R-124 is listed as “closed” in diagram and in maintenance sheets, however on the valve card, its normal position is listed as “open”.</p> <p>Please provide SED with an update on the Division’s actions in determining the correct valve position information for Valves N-529 and V-12.</p>	<p>The correct valve number for AOC 1(a) is N-519. This has been confirmed with the SED lead auditor. The valve cards for both N-519 and V-12 have been corrected to show the normal valve position as "closed". Attached, please find attachment 11 - "Valve Card N-519" and attachment 12 - "Valve Card V-12".</p>	<p>Atch 11_Valve Card N-519_CONF.pdf Atch 12_Valve Card V-12_CONF.pdf</p>
AOC	2	<p>In reviewing the Division’s maintenance records for regulator station R-437, SED observed the fire inlet and outlet valves (V-1 and V-6) documented as being hard to operate since 2010. Please provide SED with an update on the Division’s action plan for remediating the hard to operate fire valves at regulator station R-437.</p>	<p>Distribution valve V-6, the outlet fire valve for regulator station R-437, is currently classified as hard to operate but still meets PG&E torque standards and is considered to be operable. This valve can be operated by a single individual. Notification 111541903 and PM 31231197 were created to replace valve V-6. This project is currently estimated for completion in the 2nd quarter of 2017. Attached, please find attachment 13 - "Notification 111541903 Replace V-6".</p> <p>Transmission valve V-1, the inlet fire valve for regulator station R-437, is currently classified as hard to operate but still meets PG&E torque standards and is considered to be operable. This valve can be operated by a single individual. The project has been risk ranked against similar valve projects and is currently estimated for completion by the 4th quarter of 2017. Attached, please find attachment 14 - "FIMP Scope Replace V-1".</p>	<p>Atch 13_Notification 111541903 Replace V-6_CONF.docx Atch 14_FIMP Scope Replace V-1_CONF.pdf</p>
AOC	3	<p>In reviewing the Division’s maintenance records for regulator station R-390, SED discovered the Division set the relief valve above its recommended spring range of 15-50 pounds per square inch (psi). The Division mentioned plans to lower the relief set point from 53 psi to 50 psi. Please provide SED with an update on the Division’s action plan to remediate the relief valve set point.</p>	<p>The relief valve set point for regulator station R-390 was changed to 50 psi to be within the recommended spring range. The attached data sheet and maintenance records for R-390 confirm that this work was completed on 5/25/16. Attached, please find attachment 15 - "R-390 Data Sheet & Maintenance Records".</p>	<p>Atch 15_R-390 Data Sheet & Maintenance Records_CONF.pdf</p>