

2016 Hinkley District 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 Hinkley District. 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). The table below lists all of the violations from PG&E's internal review.</p> <p>The four valves at Hinkley District that were not correctly documented were PLS 34, Valve 3; PLS 35, Valve 21; PLS 2XA, Valve 3; and PLS 2XB, Valve 3.</p> <p>SED is aware that PG&E has found instances of these valve maintenance documentation violations at other districts or divisions. Please provide an update on the corrective status across the company.</p>	<p>All corrective actions related to valve maintenance documentation at the Hinkley District were corrected prior to the start of the 2016 CPUC Hinkley District Audit. Attached, please find attachment 1 - "Hinkley 2016 Internal Summary Final".</p> <p>To prevent reoccurrence across the company, valve maintenance has been tracked in SAP for all Districts since March 1, 2016 and all Divisions since 2012. Documentation of emergency valve (Districts and Divisions) and reliability valve (Districts) maintenance, per TD-4430P-04-F02, "Gas Valve Maintenance Record Form - Service History", is completed and stored in SAP as measurement points. The supervisor is required to review all completed operations/measurement points and ensure they are all answered accurately and completely. If documentation or maintenance is not completed adequately, the supervisor is required to review the operation and measurement points and return the operation (which creates a follow-on operation) to the employee to correct errors and omissions. Beginning in the 3rd quarter of 2016, PG&E is deploying an enhancement to this process that will require the supervisor to indicate why they are returning an operation for the service history form, as well as requiring an employee to provide a reason when they select N/A for a required field. Attached, please find attachment 2 - "TD-4430P-04-F02" and associated job aid, attachment 3 - "TD-4430P-04-JA02".</p> <p>In addition, Utility Bulletin TD-4001B-003 permits the use of electronic record keeping for Gas Maintenance & Operations activities. This bulletin permits personnel to record corrective and preventive maintenance data electronically, without having to duplicate this information on paper forms. Attached, please find attachment 4 - "TD-4001B-003".</p>	<p>Att 1_Hinkley 2016 Internal Summary Final_CONF.pdf Att 2_TD-4430P-04-F02.docx Att 3_TD-4430P-04-JA02.pdf Att 4_TD-4001B-003.pdf</p>
NOV	2	<p>Title 49 CFR §192.603(b) states: "Each operator shall keep records necessary to administer the procedures established under §192.605."</p> <p>Title 49 CFR §192.605 states in part:</p> <p>"a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities...</p> <p>b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations...</p> <p>b)(3) Making construction records, maps, and operating history available to appropriate operating personnel."</p> <p>During the field inspection, SED found at Trona Tap Station, one of the Pressure Transmitters was physically tagged with the label PT-5 while the SCADA system ID Tag for this same point was PT-3A. The Station Operating Diagram also showed point PT-5 labeled as PT-3A. The Operating Diagram had been red-lined to correct this error prior to the most recent revision of September 28, 2015; however the revision failed to make the correction.</p> <p>The inaccuracy of the Operating Diagram indicates that PG&E UO Standard S4460 to maintain transmission operating maps and diagrams was not followed as required by 192.605(a). The GPTC guidance on 192.605(b)(3) clarifies that the operating information provided must be current. In addition, the operating diagram as a record was not sufficiently kept in a condition to allow administration of procedures established under §192.603(b).</p> <p>PG&E is in violation of §192.605(a) and §192.603(b).</p>	<p>The correction to Operating Diagram 082131 for the Trona Tap Meter Station was completed on 4/14/2016. Attached, please find attachment 5 - "OMOD 082131 Rev 24".</p> <p>In October 2014, TD-4460P-11 "Gas Map Corrections" was published to provide the required steps personnel must follow for a gas map correction using the Corrective Action Program (CAP). This procedure was developed as a key control to identify, report, create, process, and audit map corrections. When a discrepancy is identified, TD-4460P-11-F01 "Gas Map Correction Form" is required to be completed along with creating a CAP item and associated tasks to update the map. Attached, please find attachment 6 - "TD-4460P-11" and attachment 7 - "TD-4460P-11-F01".</p> <p>In addition, in July of 2015, a 5 Minute Meeting was developed to reinforce that the use of accurate, up-to-date operating diagrams and maps are vital to the safe and reliable operation of transmission gas facilities. Links to all of the operating diagrams and maps that have been revised since August of 2014 are now provided and hardcopies are no longer automatically distributed. A file showing all of the updated operating diagrams and maps from August, 2014 to the present, including links to these documents, is updated and distributed on a regular basis. A total of 643 operating diagrams and maps have been revised since August, 2014 through July 1, 2016. Attached, please find attachment 8 - "5 Minute Meeting-Updated GT Operating Diagrams and Maps" and attachment 9 - "OMOD Aug 2014 - July 1 2016".</p>	<p>Att 5_OMOD 082131 Rev 24.pdf Att 6_TD-4460P-11.pdf Att 7_TD-4460P-11-F01.doc Att 8_5 Minute Meeting-Updated GT Operating Diagrams and Maps_CONF.docx Att 9_OMOD Aug 2014 - July 1 2016_CONF.xlsx</p>
AOC	1	<p>Designation of AMC Valves</p> <p>In 2013, Valve A on Line 313 at MP 12.63 was found to be inoperable and the adjacent Valve B was designated as an alternate method of control (AMC). However, that Valve B was also found inoperable on the same day. The AMC for Valve B was assigned to a third valve, Valve A on Line 300A at MP 141.03.</p> <p>Further record review found that both valves A and B had been made operable in 2014.</p> <p>SED recommends that in such situations, the ultimate valve required to control flow should be identified directly on all AMC forms that depend on that valve, in order to avoid delay or confusion in locating the correct valve.</p>	<p>In 2013, Valve A on Line 313 at MP 12.63 was declared an inoperable valve and the adjacent Valve B on Line 313 at MP 12.63 was designated as an alternate method of control (AMC). However Valve B on Line 313 at MP 12.63 was also designated as an inoperable valve on the same day. Valve B on Line 313 at MP 12.63 designated valve V-A on Line 300A at MP 141.03 as an alternate means of control. The AMC for Valve A on Line 313 at MP12.63 should have referenced V-A on Line 300A at MP 141.03 as the alternate means of control to avoid any unintended confusion. Both Valves A and B on Line 313 at MP 12.63 were replaced on 12/18/2015 per PM order 31099798 and the AMC was removed.</p> <p>In December 2014, Utility Bulletin TD-4430B-005 "Additional Guidance and Clarifications for TD-4430P-04, Gas Valve Maintenance - Inoperable and Alternate Means of Control Process" was published to provide updates to the requirements for designating an Alternate Means of Control (AMC) valve(s) upon discovery of inoperable Transmission and Distribution (T&D) valves. The bulletin clarifies the timeframe, the work group responsible for the action, the necessary process to follow to designate an AMC valve(s), and the steps to address the valve's inoperability. Attached, please find attachment 10 - "TD-4430B-005 Additional Guidance".</p>	<p>Att 10_TD-4430B-005 Additional Guidance.pdf</p>

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AOC	2	<p>Transmission Line Reliability</p> <p>A fire valve V-1 at MP 0.05 on Line 314, which is the tap valve for service to a Southwest Gas pipeline, is currently designated inoperable; the valve is scheduled to be replaced in December 2016. The AMC created in 2013 for this valve has been designated at MP 0.0 on Line 314, at the beginning of Line 314.</p> <p>SED is concerned that further delay in addressing the inoperable fire valve could potentially cause the entire Line 314 to be shut in, should the AMC be used, denying gas service to all of the customers along that pipeline including large industrial customers and the communities of Victorville, Adelanto, Oro Grande, and Apple Valley.</p> <p>Please provide SED an update on action(s) taken to date by PG&E to address the inoperable valve (V-1 at MP 0.05).</p>	<p>Update: PSRS 42818 and order 74004850 have been created and assigned to the Project Management Organization (PMO) to replace Valve V-1 at T-0.05 on Line 314. Estimated completion is in the 4th quarter of 2016. Attached, please find attachment 11 - "PSRS 42818".</p>	<p>Att 11_PSRS 42818_CONF.docx</p>