

Finding Type [Internal, NOV, AOC]	Finding #	Finding	Response	Associated Attachment (File Name)
NOV - PG&E's Internal Review Findings		Prior to the start of the audit, PG&E provided SED its findings from the internal review it conducted of Willows District (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). SED is aware that PG&E corrected all of its findings prior to SED's inspection. Table 1 lists all of the violations from PG&E's internal review.	There are no pending actions from the Internal review findings for the Willows District.	
NOV	1a	<p>1. Title 49 CFR §192.743(a) states: "Pressure relief devices at pressure ... This capacity must be determined at intervals not exceeding 15 months, but at least once each calendar year, by testing the devices in place or by review and calculations."</p> <p>a. SED reviewed PG&E's capacity review of relief devices at Pressure Limiting and Regulating Stations and found at Buckeye Creek Pressure Limiting Station V-A that the capacity review was not conducted for the calendar year of 2014.</p>	<p>PG&E recognizes this finding and has taken the following preventative actions:</p> <p>a.) PG&E has conducted a capacity review annually for this relief device since the missed annual review. See "Att 2 V-A Buckeye Capacity Review". Attachment 3 "H-70_Pressure-Relief Devices" (2013) describes the process for capacity reviews. This includes documenting the capacity review on the Work Ticket in SAP.</p> <p>b.) To prevent reoccurrence, all Districts have been using the AMBBS version of SAP as of March 1, 2016 to assign maintenance to District personnel and store maintenance data. Attachment 1 "Bulletin-4001B-003" (2013) describes electronic record keeping for maintenance & operation data, in lieu of recording on paper forms, which allows for improved safety, enhanced compliance records, operational flexibility, increased accessibility to M&O records, elimination of data duplication, and enhanced analytical ability.</p>	<p>Att 1_Bulletin-4001B-003.pdf Att 2_V-A Buckeye Capacity Review.pdf Att 3_H-70_Pressure-Relief Devices.pdf</p>
NOV	1b	<p>1. Title 49 CFR §192.743(a) states: "Pressure relief devices at pressure ... This capacity must be determined at intervals not exceeding 15 months, but at least once each calendar year, by testing the devices in place or by review and calculations."</p> <p>b.) SED reviewed PG&E's capacity review of relief devices at Pressure Limiting and Regulation Stations and found that a subsequent calculation had not been performed for PSV-G-11 after the station rebuild had changed conditions for PSV-G-11.</p>	<p>PG&E recognizes this finding and has taken the following corrective and preventative actions:</p> <p>a.) During the Willows District Inspection, the facility engineer performed a calculation review, revising the calculation and placed the new calculation in the binder with PSV-G-11.</p> <p>b.) To prevent reoccurrence, all Districts have been using the AMBBS version of SAP as of March 1, 2016 to assign maintenance to District personnel and store maintenance data. Attachment 1 "Bulletin-4001B-003" (2013) describes electronic record keeping for maintenance & operation data, in lieu of recording on paper forms, which allows for improved safety, enhanced compliance records, operational flexibility, increased accessibility to M&O records, elimination of data duplication, and enhanced analytical ability.</p> <p>Attachment 3 "H-70_Pressure-Relief Devices" (2013) describes the process for capacity reviews. This includes documenting the capacity review on the Work Ticket in SAP. PG&E has conducted a capacity review annually for this relief device since the missed annual review. See "Att 4 PSV-G-11 Capacity Review".</p>	<p>Att 1_Bulletin-4001B-003.pdf Att 4_PSV-G-11 Capacity Review.pdf Att 3_H-70_Pressure-Relief Devices.pdf</p>

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AOC	1	<p>During SED’s sampling of field locations it was observed that PG&E employees were performing valve maintenance activities on “hard to operate’ valves with “cheater bars” some of which violate length requirements under procedure TD-4430P-04 Appendix E.</p> <p>i.) What is the status on exploration of a new tool, as was mentioned in PG&E response to SED’s Operations and Maintenance Audit 2014 AOC-8.0?</p> <p>ii.) How will utility workers comply with the Appendix D and E of procedure TD-4430P-04 if the tool has not been made available?</p> <p>iii.) Does Appendix E need to be revised such that maximum wrench length is increased?</p>	<p>PG&E recognizes these observations and has taken the following corrective and preventative actions:</p> <p>i) Over the last 2 years, PG&E has been looking for additional tools such as a torque multiplier and T-bar style wrenches with torque value indicator / torque limiter, but there are currently limited options on the market. We’ve also looked at a hydraulic and battery operated valve exerciser tool as well, but will need further research to see if the tool will meet our needs.</p> <p>ii) In Appendix D – There are Torque Wrenches available that the O&M personnel can order for use. The TECH2FR250 is a Flex Ratchet head 25 to 250 ft-lbs wrench, which can be used on smaller valves. On larger valves that requires higher operating torque, our new requirements call for a gearbox to be mounted with the valve. For valves that are in a frame/cover where a T-bar style wrench style wrench is required, we have been looking at a tool that will limit the max. torque that can be exerted onto the valve stem, but so far nothing viable is available on the market for PG&E.</p> <p>iii) Yes. Appendix E will need to be revised to provide the following correction:</p> <p>1. The values specified in Table E-1 through E-8 for T-Bar Wrenches (inches) will be revised (in the next revision of the valve maintenance procedure) to provide both wrench-length values for when one person is using the T-bar to operate the valve, versus when there are two people operating the valve.</p> <p>In addition, a refresher tailboard reviewing Gas Valve Maintenance Work Procedure TD-4430P-04 was conducted on 1/5/2017. See "Att 5_Willows TD-4430P-04 and AMC Tailboard_Redacted.pdf".</p>	Att 5_Willows TD-4430P-04 and AMC Tailboard_Redacted.pdf