

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 10, 2023

GI-2023-01-PGE-29-07

Ms. Christine Cowsert
Senior Vice President
Gas Engineering
Pacific Gas and Electric Company
6121 Bollinger Canyon Road
San Ramon, CA 94583

SUBJECT: General Order (GO) 112-F Gas Inspection of PG&E's Operator Qualification Program

Dear Ms. Cowsert:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) Operator Qualification Program. The inspection took place between January 23-27, 2023, and on February 21, 2023.

SED's findings are noted in the Post-Inspection Written Preliminary Findings (Summary) which is enclosed with this letter. The Summary reflects only those particular records that SED inspected during the inspection. SED discovered six concerns during the inspection.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by PG&E to address the concerns noted in the Summary.

If you have any questions, please contact Sikandar Khatri at (415) 703-2565 or by email at Sikandar.Khatri@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Terence Eng".

Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Post-Inspection Written Preliminary Findings

cc: Susie Richmond, PG&E
Claudia Almengor, SED
Dennis Lee, SED

Post-Inspection Written Preliminary Findings

Dates of Inspection: January 23-27, 2023, & February 21, 2023

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: GT and GD

Assets (Unit IDs) with results in this report: Main Office (Specialized Inspections) (86283)

System Type: GT and GD

Inspection Name: PG&E Operator Qualification Inspection - 2023

Lead Inspector: Sikandar Khatri

Operator Representative: Elizabeth Wu

Unsatisfactory Results

No Preliminary Findings.

Concerns

Training and Qualification : Operator Qualification (TQ.OQ)

Question Title, ID Operator Qualification Plan and Covered Tasks, TQ.OQ.OQPLAN.P

Question 1. Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?

References 192.805(a) (192.801(b))

Assets Covered Main Office (Specialized Inspections) (86283 (29))

Issue Summary (1) The title of Operation Qualification (OQ) tasks should be indicative of the scope of the work for which these are intended for, not a general title. For example, the title for OQ task, OQ-0103 is "Operations and Maint.". The "Task Guidance" description is, "This task includes the inspection and repair of cast iron".

PG&E shall review, and also analyze any similar occurrences for all other OQ tasks and take remedial measures, as needed.

(2) TD-4008S Rev 4d, section 2.4(5) states, "OQ manager may recognize and accept the qualifications of a contract company's qualification program if the program complies with all applicable provisions of 49 CFR §192, subpart N".

The statement above should also include California Public Utilities Commission's (CPUC) General Order 112-F.

Question Title, ID Reevaluation Intervals for Covered Tasks, TQ.OQ.REEVALINTERVAL.P

Question 2. Does the OQ plan establish and justify requirements for reevaluation intervals for each covered task?

References 192.805(g)

Assets Covered Main Office (Specialized Inspections) (86283 (29))

Issue Summary PG&E changed reevaluation intervals from 3 years to 5 years for a number of OQ tasks. PG&E sent an update to CPUC through a letter dated 9/2/2020.

PG&E Standard TD-4008S Rev d section 2.3 (3) addresses the re-evaluation of employees for OQ tasks. During the inspection, PG&E explained that re-evaluation occurs on a quarterly basis. For example, if an individual was qualified for a covered task on February 20, 2019 and the task has a three-year re-evaluation interval, according to PG&E's current practice, he/she will have until the end of March 2022 to take re-qualification evaluation. This means the individual will be "un-qualified" from February 20, 2022 until he/she takes re-evaluation that can happen until March 31, 2022.

Therefore, PG&E shall make sure that re-qualification evaluation must be taken by the due date or if the quarterly system is used in PG&E; then in the quarter prior to the expiration date, i.e., in previous case by December 31, 2021.

Question Title, ID Evaluation Methods, TQ.OQ.EVALMETHOD.P

Question 4. Are evaluation methods established and documented appropriate to each covered task?

References 192.805(b) (192.803, 192.809(d), 192.809(e))

Assets Covered Main Office (Specialized Inspections) (86283 (29))

Issue Summary (1) SED reviewed PG&E's Standard TD-4008S Rev 4d, Section 2.2(3) which states that there are two methods of evaluation; 'Written' and the 'Performance' which includes Observation by Simulation, Oral evaluation and Observation during on-the-job performance, not to be used as sole method of evaluation.

(a) During the inspection, SED noted that several current OQ tasks requiring hands-on skills have only 'written' assessment. Some examples are: OQ-0101, OQ-0102, OQ-0103, OQ-0206 and OQ-0212.

(b) In addition, for OQ-0210 (pipe squeezing steel 2" thru 8"), the task guidance states that the academy training is recommended but not mandatory. This also needs to be reviewed to determine the actual need.

Therefore, PG&E should review all OQ tasks listed in the document "OQ task list-Guide to Qual_12_22-2022" (QG-4008) to determine appropriate method(s) of evaluation for each task i.e., 'written', 'performance', or 'both', and the justification should be included in the said document.

PG&E should also review the training needs for each task, as indicated for OQ-0210 in (b) above and for all other OQ tasks. The required training for each task should also be included in QG-4008 with the justification if no training is required.

(2) On 6/13/22, PG&E informed the CPUC, via a letter, that it has changed its passing score for 'written exam' from 100% to 80%, however, the passing score for "performance" exam remains 100%. However, there is no PG&E standard/procedure that includes the passing scores. PG&E also apprised that if an individual who is taking OQ evaluation receives a passing score (80% or above for written exam), he/she is provided at least ten minutes to

review the correct answers for missed or wrong answers. It was also mentioned that if the individual does not achieve a passing score, he/she can have a maximum of three attempts (including both written and performance, if applicable) to pass. If there are three failures, the individual has to wait 30 days before retesting. All of this information together with any other details should be formalized and documented in a PG&E procedure.

Training and Qualification : Qualification of Personnel - Specific Requirements (O and M Construction) (TQ.QUOMCONST)

Question Title, ID Qualification of Personnel Making Joints in Plastic Pipelines, TQ.QUOMCONST.PLASTIC.P

Question 11. Does the process require personnel making joints in plastic pipelines be qualified?

References 192.285(a) (192.285(d), 192.805(b), 192.285(c))

Assets Covered Main Office (Specialized Inspections) (86283 (29))

Issue Summary SED reviewed PG&E's D-34, "Qualifications For Joining Polyethylene Pipe" and QG-4008, "Guide to Operator Qualification," and found that the requalification requirement in these documents was written in a different way compared with 49 Code of Federal Regulations (CFR) 192.285(c). In these PG&E documents, PG&E requires an individual to re-qualify every 15 months not exceeding 2 calendar years. However, 49 CFR 192.285(c) states that, "A person must be re-qualified under an applicable procedure once each calendar year at intervals not exceeding 15 months, or after any production joint is found unacceptable by testing under §192.513."

According to PG&E, 49 CFR 192.285(c) was rewritten in these documents to clarify the plastic qualification interval from the perspective of when a person's current qualification would expire. Instead of saying an individual needs to be qualified every calendar year not to exceed 15 months, it was rephrased by PG&E to communicate their current qualification would expire after 15 months not exceeding the second calendar year.

SED is concerned that PG&E's current wording on the requalification requirement could be confused as the maximum interval being two calendar years or 24 months. To eliminate confusion, PG&E has updated its procedure to align more with the wording from 49 CFR 192.285(c), and the procedure is currently awaiting publishing approval. D-34 will be superseded by TD-4171S. QG-4008 will be updated once the procedure, TD-4171S, has been published.

Please provide SED an update on the status of these changes in PG&E's response letter.