

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 24, 2021

GI-2021-03-SCG-40-08 / GI-2021-03-SDG-53-08

Rodger Schwecke, Senior Vice President
Chief Infrastructure Officer Southern California Gas Company
555 West 5th Street, GT21C3
Los Angeles, CA 90013

SUBJECT: General Order 112 Inspection of the Southern California Gas Company's and San Diego Gas and Electric Company's Gas Transmission Integrity Management Program (TIMP)

Dear Mr. Schwecke:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission, Paul Penney, Randy Holter and Sann Naing conducted a General Order 112 inspection of Southern California Gas Company (SoCal Gas) and San Diego Gas and Electric Company (SDG&E) Transmission Integrity Management Programs (TIMP) the weeks of 3/15→3/19/21 and 3/22→3/26/21. The inspection included a review of records related to the TIMP in-line inspection (ILI) program and follow-up from the 2020 TIMP inspection.

SED's findings are noted in the Post-Inspection Written Findings (Summary) which is enclosed with this letter. The Summary reflects only those records that SED inspected during the inspection and the follow-up from the 2020 TIMP inspection. SED found one violation during the inspection.

Please provide a written response within 30 days of your receipt of this letter indicating measures taken by SoCal Gas and SDG&E to address the findings noted in the Summary.

If you have any questions, please call Paul Penney at (415) 703-1817.

Sincerely,

A handwritten signature in blue ink, appearing to read "Terence Eng".

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

cc: Troy Bauer, SoCal Gas
Gwen Marelli, SoCal Gas
Dennis Lee, GSRB
Paul Penney, GSRB
Randy Holter, GSRB
Sann Naing, GSRB

Post-Inspection Written Findings

Dates of Inspection: 3/15→3/19/21 and 3/22→3/26/21

Operator: SoCal Gas/SDG&E

Operator IDs: 18484 (primary) 18112

Inspection Systems: The entire system where ILI is used

Assets (Unit IDs) with results in this report: SoCal Gas Main Office Inspection (5305)

System Type: GT

Inspection Name: (2021) SoCal Gas/SDG&E TIMP Inspection - ILI Focused

Lead Inspector: Paul Penney

Operator Representative: Alex Hughes, et all (see attendance sheet)

Unsatisfactory Results

Assessment and Repair : Stress Corrosion Cracking Direct Assessment (SCCDA) (AR.SCC)

Question : 6. Do records demonstrate that an assessment was performed using one of the methods specified in ASME B31.8S-2004 Appendix A3?

References: 192.947(g) (192.929(b)(2))

Assets Covered: SoCal Gas Main Office Inspection (5305)

With regard to the white paper from Southern California Gas Company (SoCal Gas)/San Diego Gas & Electric Company (SDG&E), Gas Safety and Reliability Branch (GSRB) staff has the following comments:

1. The paper clearly demonstrates Electro-Magnetic Acoustic Transducer (EMAT) is an In-Line-Inspection (ILI) technology and is consistent with most code requirements (See item 3 below).
2. The paper also demonstrates EMAT is equivalent in detecting cracking defects that would result in immediate or safety related indications.
3. Nonetheless, American Society of Mechanical Engineers (ASME) B31.8S-2004, Section A3.4 states that if a pipeline segment experiences an in-service leak or rupture attributable to stress corrosion cracking, the particular segment shall be subjected to a hydrotest. SoCal Gas/SDG&E's procedures should include this possibility.
4. As noted by SoCal Gas/SDG&E in the white paper, procedures for the use of EMAT must be developed (Section 7 of the white paper).

SoCal Gas/SDG&E wrote the white paper as a result of GSRB staff having a concern about EMAT being used on Line 6902. As stated above, SoCal Gas/SDG&E has convinced GSRB staff that EMAT is covered in ASME B31.8S-2004, Section 6.2.

5. ASME B31.8S-2004, section 6.2.5 states in part (this reference was cited in the white paper):

"Generally, representatives from the pipeline operator and the ILI service vendor should analyze the goal and objective of the inspection, and match significant factors known about the pipeline and expected anomalies with the capabilities and performance

of the tool. Choice of tool will depend on the specifics of the pipeline section and the goal set for the inspection. The operator shall outline the process used in the integrity management plan for the selection and implementation of the ILI inspections."

Therefore, SoCal Gas/SDG&E is in violation of Title 49 Code of Federal Regulations (49 CFR), §192.907(b) and ASME B31.8S-2004, section 6.2.5 for not having procedures in place prior to using EMAT on Line 6902. Please indicate how SoCal Gas/SDG&E will resolve the lack of having procedures in place prior to EMAT being used on Line 6902.

Please provide a copy of these procedures to GSRB staff so that we can review and provide comments.

The procedures should include all sections in the new 49 CFR, § 192.712 related to cracks (i.e., how Charpy V-Notch toughness values without traceable verifiable and complete records will be determined if the conservative values are not used).

Concerns

No Concerns