

**2016 Burney District CPUC Audit Responses**

Finding Type [Internal, NOV, AOC]	Finding #	Finding	Response	Associated Attachment (File Name)
NOV - PG&E's Internal Review Findings	IRSF	<p>Prior to the start of the audit, PG&amp;E provided SED its findings from the internal review it conducted of Burney District. Some of PG&amp;E's internal review findings are violations of PG&amp;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&amp;E corrected some of its findings prior to SED's inspection. Table 1 lists all of the violations from PG&amp;E's internal review.</p> <p>The following internal review finding was pending resolution at the time of the audit:</p> <p>Burney District did not fully document an annual station leak survey for Shingletown Pressure Limiting Station in 2015.</p>	<p>Initial Response: A Burney District mechanic performed a station leak survey on 5/11/15, but did not document the survey on form TD-4110P-03-F20. PLM Report 7 and an "A- form", which document leak survey activity on 5/11/15 at Shingletown, have been placed in binder 14, tab 6. CAP #7028813.</p> <p>Updated Response: On 5/05/2016, the District crew received a refresher tailboard on all of the findings on the Internal Summary, including documentation of station leak survey. Attached, please find attachment 1 – "Burney Internal Summary Tailboard". In addition, station leak survey at Shingletown PLS was performed on 5/23/2016 and again on 11/28/2016 with no leaks found. Please see attachment 2 – "Shingletown PLS Leak Survey".</p>	<p>Att 1 Burney Internal Summary Tailboard Att 2 Shingletown PLS Leak Survey</p>
NOV	1	<p>Title 49 CFR §192.201(a) states in part:</p> <p>(a) Each pressure relief station or pressure limiting station or group of those stations installed to protect a pipeline must have enough capacity, and must be set to operate to insure the following:</p> <p>(2) In pipelines other than a low pressure distribution system:</p> <p>(i) If the maximum allowable operating pressure is 60 p.s.i. gage or more, the pressure may not exceed the maximum allowable operating pressure plus 10 percent or the pressure that produces a hoop stress of 75 percent of SMYS, whichever is lower;</p> <p>In 2016 the facility engineer reviewed the capacity of PSV-187S and determined the existing relief to be insufficient. The facility engineer then used form FH70A to calculate the necessary capacity and recommended a replacement relief valve which was later installed. PG&amp;E was unable to determine the date of installation of the original relief valve and instead indicated an in-service date of December 18, 2003. PG&amp;E is in violation of 49 CFR §192.201(a)(2)(i) for not having adequate relief capacity from the in-service date to the corrected date. SED notes that PG&amp;E included this finding in their internal review and has completed corrective action. However, SED finds the description of the finding different than what was disclosed on the internal review.</p>	<p>PG&amp;E recognizes these observations and has taken the following corrective and preventative actions:</p> <p>a) This item was entered into PG&amp;E's Corrective Action Program and was replaced on April 25, 2016. This finding was reported in the Internal Summary of Findings and all corrective actions were completed prior to the audit. In addition, a tailboard was conducted with the crew to review each of the internal summary findings. See Att 1 "Burney Internal Summary Tailboard".</p> <p>b) To prevent recurrence, in 2013, PG&amp;E transitioned to electronic collection of data to SAP. Attachment 5 "Bulletin-4001B-003" (2013) describes electronic record keeping for maintenance &amp; operation data, in lieu of recording on paper forms, which allows for improved safety, enhanced compliance records, operational flexibility, increased accessibility to M&amp;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&amp;E has conducted a capacity review annually for this relief device since the missed annual review. See Att 4 PSV-187S Capacity Review.</p>	<p>Att 1 Burney Internal Summary Tailboard Att 3 H-70_Pressure-Relief_Devices Att 4 PSV-187S Capacity Review Att 5 Bulletin-4001B-003</p>