

2016 Rio Vista and Los Medanos District Audit Findings and Responses

Finding Type [Internal, NOV, AOC]	Finding #	Finding	Response	Associated Attachment (File Name)
PG&E's Internal Review Findings	1	Prior to the start of the audit, PG&E provided SED its findings from the internal review it conducted of Rio Vista 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 some of its findings prior to SED's inspection. Table 1 lists all of the violations from PG&E's internal review.	Per the attached summary of PG&E's Rio Vista and Los Medanos District Internal Review, there were 6 findings noted by SED from PG&E's internal review findings that were violations of PG&E's standards, and are therefore violations of Title 49 Code of Federal Regulations (CFR) §192.605(a). All corrective actions related to these findings were completed prior to the start of the audit. Attached, please find attachment 1 - "Rio Vista-Los Medanos Internal Review".	Atch 1_ Rio Vista-Los Medanos Internal Review.pdf
AOC	1 (a)	SED reviewed the Rio Vista Gas Valve Maintenance record at Rio Vista Y valve lot and identified Emergency Transmission Valve (L-200) # 0.00 designated as a Main Line Valve (MLV). However, during the field verification it was revealed that this valve was not an MLV, but instead a Tap Valve. The District responded that this was a typing error, and corrected the Valve Maintenance record.	Per consultations with SED, the correct valve referenced in AOC 1(a) is L-220 Valve 0.00. The valve card (TD-4430P-04-F01 - "Gas Valve Maintenance Record Form") for this valve has been updated to reflect its use as a Tap valve. It should be noted that this valve is a reliability valve. This has also been updated on the valve card. Attached, please find attachment 2 - "L-220 V-0.00 Valve Card".	Atch 2_L-220 V-0.00 Valve Card.pdf
AOC	1 (b)	Records of inspection for Valve # 0.00 (L-200) for 2013 and 2014 were not found on the Valve Maintenance record card. However, electronic copies of the inspections were provided.	<p>Per consultations with SED, the correct valve referenced in AOC 1(b) is L-220 Valve 0.00. The maintenance for this reliability valve was recorded electronically in 2013 and 2014 and provided for review to SED during the audit.</p> <p>From 2014 to date, valve cards have been created for the districts reliability valves as required by TD-4430P-04. Prior to 01/01/2014, the backbone districts were not required to document maintenance for reliability valves on valve cards and maintenance was documented electronically.</p> <p>On 12/1/2015, Rio Vista District began using the AMBBS version of SAP to assign maintenance to District personnel and store maintenance data on all reliability and compliance valves. All information captured on TD-4430P-04-F02 (valve service history form) is captured and viewable in AMBBS as well as on the valve cards. The supervisor is required to review all completed operations within 30 days and ensure they are answered accurately and completely. PG&E also has a Quality Control Group which performs record reviews on 100% of completed maintenance on a monthly basis to ensure compliance. In Rio Vista and Los Medanos Districts, this is performed by Operation Specialists from the Gas T&D Compliance Department.</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 3 - "TD-4001B-003".</p>	Atch 3_TD-4001B-003.pdf
AOC	2	During SED's field verification at Rio Wye Station, SED noted that Gas Transmission blowdown valve #K, which was connected to Valve #19, was found to be inactive.	V-K is a blowdown valve for L-403, and will remain in place for operational flexibility. V-19 is a tap valve that currently does not serve a purpose but will remain in-place for potential future-use. Both V-K and V-19 are on annual maintenance plans and will continue to be maintained as required by TD-4430P-04. Attached, please find attachment 4 - "V-K Valve Card" and attachment 5 - "V-19 Valve Card".	Atch 4_V-K Valve Card.pdf Atch 5_V-19 Valve Card.pdf
AOC	3 (a)	During SED's field verification at Serpa Station, SED noted that Transmission valves V-63 and 64 were both identified as valves for L-200. However, in the field it was observed that both lines had different operating pressure. The District realized that valve V-64 was on L-200 and V- 63 was on L-200A.	<p>Per consultations with SED, the correct valves referenced in AOC 3(a) are V-63 and V-66. There is not a valve V-64 at Serpa Junction.</p> <p>Per Operating Diagram 385178 of Serpa Junction, V-63 is connected with the L-200A11 system and V-66 is connected with the L-200A12 system. The valve cards have been corrected to reflect this. Attached, please find attachment 6 - "Operating Diagram 385178", attachment 7 - "V-63 Valve Card and Maintenance Record" and attachment 8 - "V-66 Valve Card and Maintenance Record".</p>	Atch 6_Operating Diagram 385178.pdf Atch 7_V-63 Valve Card and Maintenance Record.pdf Atch 8_V-66 Valve Card and Maintenance Record.pdf

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AOC	3 (b)	Records of inspections for valves V-63 and V-64 for 2013 and 2014 were not found on the Valve Maintenance records, however, electronic copies of the inspections were provided.	<p>Per consultations with SED, the correct valves referenced in AOC 3(a) are V-63 and V-66. There is not a valve V-64 at Serpa Junction.</p> <p>Valve V-63 had maintenance recorded on the valve maintenance record in 2013 and 2014. Attached, please find attachment 7 - "V-63 Valve Card and Maintenance Record". Valve V-66 had maintenance recorded on the valve maintenance record in 2014. Attached, please find attachment 8 - "V-66 Valve Card and Maintenance Record". The maintenance for Valve V-66 was recorded electronically in 2013 and provided for review to SED during the audit. The valve had been classified as a reliability valve in PLM prior to creation of the valve card. The valve is now correctly classified as an emergency valve.</p> <p>From 2014 to date, valve cards have been created for the districts reliability valves as required by TD-4430P-04. Prior to 01/01/2014, the backbone districts were not required to document maintenance for reliability valves on valve cards and maintenance was documented electronically.</p> <p>On 12/1/2015, Rio Vista District began using the AMBBS version of SAP to assign maintenance to District personnel and store maintenance data on all reliability and compliance valves. All information captured on TD-4430P-04-F02 (valve service history form) is captured and viewable in AMBBS as well as on the valve cards. The supervisor is required to review all completed operations within 30 days and ensure they are answered accurately and completely. PG&E also has a Quality Control Group which performs record reviews on 100% of completed maintenance on a monthly basis to ensure compliance. In Rio Vista and Los Medanos Districts, this is performed by Operation Specialists from the Gas T&D Compliance Department.</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 3 - "TD-4001B-003".</p>	
AOC	4	During SED's field verification at Station Charge 1 of Transmission line L-200, SED observed that the pressure recording device manufactured by Reynolds Equipment Company was not functioning. There were no pressure recordings on the chart.	The actual location where the Reynolds Equipment Company recorder was observed by SED was the Church 1 Well on Transmission line L-200. The Church 1 well was not flowing at the time of the auditors inspection. The pressure recorder requires a minimum of 30 psig on the meter tube to record on the chart. Therefore, there was not the minimum pressure required for the recorder to record the pressure. This well has not produced gas through the meter for more than 6 months. The well is currently scheduled for abandonment by the owner of the well in 2017.	