



SOUTHWEST GAS CORPORATION

Jerome T. Schmitz, P.E., Vice President/Engineering

April 28, 2017

Mr. Kenneth Bruno
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
320 West 4th Street, Suite 500
Los Angeles, CA 90013

Subject: Southwest Gas Corporation Response to Summary of Inspection Findings from GO112 Operation and Maintenance Inspection of Southern California Division Gas transmission and Distribution System for Valves, Pressure Regulation and Overpressure Facilities

Dear Mr. Bruno,

Southwest Gas Corporation respectfully submits the following response to the Safety Enforcement Division's (SED) Summary of Inspection Findings dated April 3, 2017. The response addresses the Probable Violation identified by SED during the inspection.

We appreciate SED's consideration of this matter. Please do not hesitate to contact me if there are any questions or concerns.

Sincerely,

cc: D. Shrestha (CPUC)
K. Tong (CPUC)
C. Mazzeo
K. Lang
V. Ontiveroz



Summary of Inspection Findings
2016 SWG Victorville Division Gas Transmission & Distribution System Inspection
October 10-14, 2016

SED Identified Probable Violation

Title 49 CFR, Part 192, Section 192.605 Procedural manual for operations, maintenance, and emergencies.

§192.605(b) Procedural manual for operations, maintenance, and emergencies states in part:

(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(3) Making construction records, maps, and operating history available to appropriate operating personnel.”

On October 12, 2016, SED’s staff noted that the Relief Valve Station ID 11DS10026421 on First Ave, Barstow, CA, did not have station layout drawing on-site. SWG’s employee tried locating the station layout in his computer and but was unable to locate one. The employee called SWG’s engineering department and, eventually, was able to obtain information on the control valve operating sequence. The unavailability of station layout drawing on-site may lead to incorrect identification and, ultimately, to an incorrect operation. SWG failed to make the station drawing available to operating personnel, therefore, SWG is in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, Section 192.605(b)(3).

Southwest Gas Response

Southwest Gas agrees that construction records (e.g., as-builts) and maps should be available to the appropriate operating personnel – and the Company does make these records available to the appropriate field personnel electronically. The Company also provides computers that employees can use to access said information. Notwithstanding, the Company acknowledges that the employee observed during the inspection was not able to access the construction records for the station using his computer. Consistent with Company procedures, the engineering department was then contacted to request the information. Nevertheless, the information was available electronically during the inspection. This was demonstrated when another Southwest Gas employee retrieved the station’s construction records and maps by accessing the same electronic database.

Southwest Gas has since taken steps to confirm and ensure that the appropriate operating personnel have access to electronic data. The Company also provided refresher training to Southern California Division employees, as applicable, on how to utilize the electronic database.

Further, the Company is investigating additional methodologies and drawing formats to communicate this information to the appropriate field personnel. The results of this investigation will be communicated to the SED during future bi-annual pipeline safety meetings.