

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



March 2, 2020

Jerry Schmitz  
Vice President, Engineering  
Southwest Gas Corporation  
5241 Spring Mountain Road  
Las Vegas, NV 89193-8510

GI-2020-02-SWG-30-03

Subject: General Order (G.O.) 112-F Inspection of Southwest Gas Company's Operation and Maintenance Procedures

Dear Mr. Schmitz:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112-F review and inspection of Southwest Gas Company's (SWG) updates to their Operation and Maintenance (O&M) Procedures on February 10-14, 2020. SED staff reviewed SWG's written O&M procedures pursuant to G.O. 112-F, Reference Title 49, Code of Federal Regulations (CFR), Parts 191 and 192 and used Pipeline and Hazardous Material Safety Administration's (PHMSA) Inspection Assistant (IA) as a reference guide to conduct the inspection.

SED's findings are noted in the Post-Inspection Written Preliminary Findings (Summary) which is enclosed with this letter.

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

If you have any questions, please contact Jason R. McMillan at (916) 928-2271 or by email at Jason.McMillan@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

CC: Laurie Brown, SWG  
Jason McMillan, SED/GSRB  
Dennis Lee, SED/GSRB  
Claudia Almengor, SED/GSRB

# Post-Inspection Written Preliminary Findings

**Dates of Inspection:** 2/10/2020 – 2/14/2020

**Operator:** SOUTHWEST GAS CORP

**Operator ID:** 18536

**Inspection Systems:** SWG Office

**Assets (Unit IDs):** Main Office (Specialized Inspections) (88373), and SWG - Transmission (88674)

**System Type:** GT

**Inspection Name:** SWG O&M – updates, and SWG - O&M -T – updates

**Lead Inspector:** Jason R. McMillan

**Operator Representative:** Laurie Brown

## Unsatisfactory Results

No Preliminary Findings.

## Concerns

### 1. Design and Construction: Construction Welding Procedures (DC.WELDPROCEDURE)

Question Text Does the operator have written specifications requiring qualified welding procedures in accordance with 192.225?

References 192.225

Assets Covered SWG - Transmission (88674 (91))

Issue Summary SED reviewed the new Shielded Metal Arc Welding (SMAW) welding procedure specifications (WPS):

- LBF-312H
- LBF-332H
- LFFV312H
- LFFV322H
- LFFV332H

All five WPS documents state that no line-up clamp is required. However, SWG's "Steel Welding Procedure," section 1.14.3 instructs the welder to *"Use line-up clamps on 4.50 inches and larger pipe when line pipe butt welding."*

SWG claims that their welders are trained to follow both the WPS and the Steel Welding Procedure, and would therefore know to use line-up clamps on 4.50 inch diameter pipe.

SED recommends the any WPS that includes diameter group 2 (2.375 inch through 12.750 inch) or 3 (Greater than 12.750 inch) be updated to state that line-up clamps are required on 4.5-inch diameter or larger pipeline, or to instruct the welder to refer to the appropriate

section of the Steel Welding Procedure.

## **2. Procedures: Reporting (PRO.REPORT)**

Question Text Does the process require preparation and filing of an incident report as soon as practicable but no later than 30 days after discovery of a reportable incident?

References 191.9(a)

Assets Covered Main Office (Specialized Inspections) (88373 (30))

Issue Summary Section 13.2.4.2 of the Emergency Plan Manual states to "*Forward press releases and other relevant e-mails during the incident to CPUC staff at the following e-mail address: e\_emergency@cpuc.ca.gov.*"

However, test emails to that address were not delivered, and error messages were returned from the CPUC email server stating that "The email address you entered couldn't be found."

SED brought this concern to SWG's attention and recommended that SWG update this procedure to include a valid email address. SWG claimed that their current practice is to email any updates regarding incidents to the USRB email inbox used for incident reporting, and that they would amend the procedure to reflect that.

## **3. Procedures: Corrosion Control (PRO.SUBICORROSION)**

Question Text Does the process provide adequate instructions for the installation of test leads?

References 192.605(b)(2) (192.471(a), 192.471(b), 192.471(c))

Assets Covered Main Office (Specialized Inspections) (88373 (30))

Issue Summary SED reviewed the "Corrosion Control Section I Procedure" and the "Corrosion Control Design" document. Section 1.2.4 of the Design document was updated in 2019 to state, "*When designing galvanic anode systems for transmission pipelines, the anode(s) shall be connected to the pipeline through test stations.*" However, section 8.1.5 of the Corrosion Control Section I Procedure states, "*Test stations are optional with the installation of sacrificial anodes.*"

SED recommends that SWG amend language within the Corrosion Control Section I Procedure to include the more specific language in the design document.