



# SOUTHWEST GAS CORPORATION

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

April 1, 2020

Mr. Terence Eng  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Committee  
505 Van Ness Avenue  
San Francisco, CA 94102

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

Dear Mr. Eng,

Southwest Gas Corporation (Southwest Gas or Company) respectfully submits the enclosed response to your letter dated March 2, 2020, regarding G.O. 112-F review and inspection of the Company's Operation and Maintenance (O&M) Procedures conducted February 10-14, 2020, in which Safety and Enforcement Division (SED) identified three recommendations.

Should you have any questions, please feel free to contact me.

Sincerely,

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

cc: Brad Harris  
Kevin Lang  
Valerie Ontiveroz

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.

**Southwest Gas Response:** Southwest Gas agrees with SED's recommendation and will revise its welding procedure specification. The revisions will be completed by the June 30, 2020.

## **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.

**Southwest Gas Response:** Southwest Gas agrees with SED's recommendation and will revise its Emergency Plan Manual. The revision will be completed by the March 31, 2020.

## **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.

**Southwest Gas Response:** Southwest Gas agrees with SED's recommendation and will revise its Corrosion Control Section I Procedures to align with the Corrosion Control Design section. The revision will be in the June 30, 2020 release of the Company's Operations Manual.