



SOUTHWEST GAS CORPORATION

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

July 6, 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 Corporation's Operator Qualification Program

Dear Mr. Eng,

Southwest Gas Corporation (Southwest Gas or Company) respectfully submits the enclosed response to your letter dated June 8, 2020, regarding G.O. 112-F review and inspection of the Company's Operator Qualification (OQ) Program conducted June 1-5, 2020, in which Safety and Enforcement Division (SED) identified one unsatisfactory result.

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

Sincerely,

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

cc: Brad Harris
Catherine Mazzeo
Kevin Lang
Valerie Ontiveroz

Dennis Lee, CPUC
Claudia Almengor, CPUC
Joel Tran, CPUC

Post-Inspection Written Preliminary Findings

Dates of Inspection: 6/1/2020 – 6/5/2020

Operator: SOUTHWEST GAS CORPORATION

Operator ID: 18536

Inspection Systems: Operator Qualification Program

Assets (Unit IDs): Main Office (Specialized Inspections) (88373)

Inspection Name: Southwest Gas Operator Qualification

Lead Inspector: Joel Tran

Operator Representative: Laurie Brown

Unsatisfactory Results

Generic Questions: Generic Questions (GENERIC.GENERIC)

Question Text Generic question

References 192.805

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

Issue Summary 192.805 states "Each operator shall have and follow a written qualification program."

While reviewing qualification records for Corrosion Specialists, SED noted one employee, Jeff E Shurley (OQ/PJQ Number: SWG12832), who was not re-qualified in 2016 for the *OQ-Damage Prevention During Excavation* covered task. Although Mr. Shurley did not perform any excavation activities during the calendar year 2016, Southwest Gas' Operator Qualification Plan requires Corrosion Specialists to be qualified once a year for this covered task. Mr. Shurley was qualified on 4/21/2015 with a subsequent re-qualification on 5/3/2017, missing the 2016 re-qualification.

Southwest Gas Response:

Southwest Gas acknowledges that one of its Corrosion Specialists' OQ-Damage Prevention During Excavation lapsed from January 1, 2017 to May 3, 2017, based on the requirements for his job position. During the inspection, the Company acknowledged the lapse and confirmed that the specialist had not performed any excavation activities during the lapsed period.

Since 2017, the Company has implemented several internal processes to help ensure lapses in OQ training/requalifications do not occur, as discussed during the inspection these include the following actions. The Company's Learning Management System (LMS) has been programmed to provide automated notifications to Company supervisors and individual employee 15 days prior to the expiration of an employees' operator qualification, if no action is taken by 7 days prior to the expiration date emails are automatically sent daily until the requalification is recorded. At this same time, the Operator Qualifications Program Administrator is also notified of the pending expiration dates and takes actions, such as contacting the supervisor, the employee, and the Company's Division Based Trainer to determine why requalification training has not been completed. Furthermore, the Operator Qualification Plan Team has implemented a bi-monthly report of upcoming OQ expiration dates, which is provided to supervisors to help plan and schedule their employees for upcoming requalification training.

Concerns

No Preliminary Concerns.