



**Pacific Gas and
Electric Company**

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August 26, 2011

Honorable Deborah A.P. Hersman
National Transportation Safety Board
490 L'Enfant Plaza, SW
Washington, DC 20594

Re: NTSB Safety Recommendation P-11-3

Dear Chairman Hersman,

On June 8, 2011, the NTSB issued Safety Recommendation P-11-3 to PG&E arising out of your ongoing investigation into the tragic accident in San Bruno, California, on September 9, 2010. The Safety Recommendation stated that PG&E should:

Require your control room operators to notify, immediately and directly, the 911 emergency call center(s) for the communities and jurisdictions in which your transmission and/or distribution pipelines are located, when a possible rupture of any pipeline is indicated.

In your June 8 letter, you requested that PG&E respond within ninety days with the actions we have taken or intend to take to implement the recommendation.

PG&E is fully committed to working expeditiously and cooperatively with the National Transportation Safety Board, the California Public Utilities Commission and other stakeholders to restore public confidence in the safety and integrity of our natural gas transmission system. Ensuring effective and timely emergency response to both potential and actual emergency gas events is critical to protecting public safety and restoring that confidence.

To that end, PG&E established and has put into place the attached Gas Control Room Process (911 Notification Process) pursuant to which PG&E Gas Control will notify the appropriate 911 agency whenever an incident has the potential of becoming an emergency operating condition that may affect the safety of the public, property or the environment. PG&E will also be evaluating industry best practices in this area and will incorporate such practices as appropriate into its procedures.

PG&E is dedicated to taking all of the steps necessary to ensure public safety and the integrity of our gas pipeline systems. PG&E's actions in response to the NTSB's Safety Recommendation are an important step in that process.

Sincerely,

Attachment

cc: Ravindra Chhatre, Investigator-in-Charge
Stephen J. Klejst

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911 Notification Process

Summary This work process provides guidance to Gas Control when determining the need to notify the 911 Emergency Response Center(s) whenever an incident has the potential of becoming an emergency operating condition that may affect the safety of the public, property or the environment.

Target Audience Gas System Operations, Gas Control: Gas Control Manager, Gas System Supervisor, Senior Transmission Coordinators, Transmission Coordinators, Gas System Operators, Gas Dispatch, local Governmental Relations

Safety This process will outline roles and responsibilities to ensure control room personnel are provided with information, tools and training needed to operate PG&E's pipeline system safely and enhance public safety agency response times to pipeline ruptures.

Before You Start Qualifications: Senior Transmission Coordinators, Transmission Coordinators and Gas System Operators are to complete Operator Qualification ASME B31Q for required tasks. (monitoring, remote open/close valves, start/stop compressors)

Training: Senior Transmission Coordinators, Transmission Coordinators and Gas System Operators will complete all training as detailed in TD4436P-06, Gas Control Room Training Procedure.



911 Notification Process

Detailed Process

Gas Control Room Management Operations Manual includes the following:

- Gas Control Shift Change Process located in Section 2 of the Gas Control Room Operations Manual.
- 1 In the event of an emergency operating condition, that has the potential of impacting the public, property, or the environment, Gas Control will make the determination to make notifications to the 911 Emergency Response Center(s) to establish "situational awareness".
1. This notification initiates communications between Gas Control and the responsible 911 Emergency Response Center(s).
 2. The Senior Transmission Coordinator will make the notification to the responsible 911 Emergency Response Center(s) using the Gas Control Contact Matrix, located in Section 2.4 of the Control Room Operations Manual.
 3. The Senior TC will provide a detailed description of the potential incident to the 911 dispatcher providing the following:
 - a. Name of Senior TC making call
 - b. Analysis of potential incident
 - c. Location of potential incident
 - d. Contact number to notify Gas Control if any additional updates are received
 4. The Senior TC will also obtain the following information from the dispatcher at the responsible Emergency Response Center(s).
 - a. Name
 - b. Any information they might have received about the potential incident.
 - c. Additional contact number to reach them for further updates.
- 2 The determination to make notifications to the 911 Emergency Response Center(s) will be made by examining the *triggers* identified in Section 3, along with input from either the Gas Control Manager, or Gas System Supervisor, if available.



911 Notification Process

- 3 *Triggers* listed below are for any incident that has the *potential* of becoming an emergency operating condition that may affect the safety of the public, property or the environment. The *potential* of an incident will be determined by the Senior Transmission Coordinator, based on information received by Gas Control, either via Citect SCADA, field communications, or other sources of information. The Senior Transmission Coordinator will make the decision for Gas Control to notify the 911 Emergency Response Center(s) if it has been determined that one of the following items may have occurred, or potentially will occur:
 1. Gas Transmission Pipeline Ruptures
 - a. Unscheduled Gas Venting
 - b. Gas Fire
 - c. Gas Explosion
 2. Gas-Related Evacuation of any facilities ordered by PG&E due to a gas transmission line issue
 3. Major Gas Quality Upset
- 4 The nature of the incident, or event, will determine whether the Senior Transmission Coordinator activates the Emergency Event Command Mode (EECM), located in Section 2.4 of the Control Room Management Operations Manual.
- 5 Based on the nature of the incident, or event, the Senior Transmission Coordinator will consider activating the Alternate Gas Control Relocation Plan, located in Section 2.10 of the Control Room Management Operations Manual.
- 6 Gas Control will document all communications made with 911 Emergency Response Center(s), using the Gas Logging System Process, Abnormal Incident Reporting Process, and the GSO Gas Incident Notification Process, as required. These processes are located in Section 2.4 of the Control Room Management Operations Manual.
- 7 Gas Control will notify Gas Dispatch and the local Governmental Relations representative of the time of the reach-out to the 911 Emergency Response Center(s), the name of the person contacted, and the current status of the contact (e.g. completed, ongoing, escalating . . .).
- 8 911 Emergency Response Center contact information is located in the Communications Plan Master Contact List, located in Section 2.4, Appendix 1, in the Control Room Management Operations Manual.
- 9 Roles and Responsibilities
 - a. Gas Control Manager
 - (1) Oversee the overall execution, annual review and maintenance of the 911 Notification Process.



911 Notification Process



b. Gas System Supervisor

- (1) Ensure 911 Notification Process is implemented and maintained.
- (2) Review 911 Notification Process annually for effectiveness.

10 Recordkeeping

See TD-4436S, "Gas System Operations Control Room Management Standard," Section 10, "Recordkeeping," for recordkeeping instructions.

[INSTRUCTION for Cautions and Warnings - Use the automated toolbar to format the caution or warning then copy and paste the appropriate symbol below in front of the word.

 = CAUTION or  = WARNING]

END of Instructions



911 Notification Process

Definitions **911 Emergency Response Center:** any location responsible for directly dispatching local fire and police in response to emergency situations.

**Implementation
Responsibilities** Manager of Gas Control

- Training, Tailboards, and Quarterly Operations Meetings

**Governing
Document** Utility Standard: Gas System Operations Control Room #:TD-4436S

**Compliance
Requirement/
Regulatory
Commitment** CFR 49 192.631, Control Room Management Rule

**Reference
Documents** **Developmental References:**

Supplemental References: EMR 1011M Company Gas Emergency Response Plan

Appendices

Attachments

**Document
Revision** Not applicable, this is a new document.



911 Notification Process

Approved By

Document Owners Redacted Manager Gas Control

Document Contact Redacted Senior Transmission Coordinator



911 Notification Process

Revision Notes

Where?	What Changed?
[Write the location within the document (i.e., section, step, or substep number) of the change.] 0	[Include a brief description of any significant change(s) from the previous version of this document. List each change on a separate line.] New Issue.