



# National Transportation Safety Board

Washington, D.C. 20594

Office of the Chairman

**MAR 14 2013**

Mr. Christopher P. Johns  
President  
Pacific Gas and Electric Company  
77 Beale St.  
San Francisco, CA 94105

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**MAR 19 2013**

**CHRISTOPHER P. JOHNS**

Dear Mr. Johns:

Thank you for your January 31, 2013, letter to the National Transportation Safety Board (NTSB) regarding Safety Recommendations P-10-3 and P-11-24 and -31, stated below. We issued these recommendations to the Pacific Gas and Electric Company (PG&E) on January 3, 2011, and September 26, 2011, as a result of our investigation of the September 9, 2010, natural gas pipeline rupture that occurred in a residential area in San Bruno, California. Safety Recommendation P-10-3 is an urgent recommendation.

## P-10-3

Use the traceable, verifiable, and complete records located by implementation of Safety Recommendation P-10-2 (Urgent) to determine the valid maximum allowable operating pressure [MAOP], based on the weakest section of the pipeline or component to ensure safe operation, of Pacific Gas and Electric Company natural gas transmission lines in class 3 and class 4 locations and class 1 and class 2 high consequence areas [HCA] that have not had a maximum allowable operating pressure established through prior hydrostatic testing.

Because PG&E validated the MAOP of its pipeline system, as requested, Safety Recommendation P-10-3 is classified "Closed—Acceptable Action." The NTSB recognizes that this was a major undertaking, as it entailed validation of the MAOP of 2,088 miles of these transmission pipelines. We are pleased that PGE also is validating an additional 4,199 miles of non-HCA pipelines.

## P-11-24

Revise your work clearance procedures to include requirements for identifying the likelihood and consequence of failure associated with the planned work and for developing contingency plans.

The revisions that PG&E has made to its work clearance procedures and other PG&E actions discussed in your letter satisfy the intent of Safety Recommendation P-11-24. Accordingly, this recommendation is classified "Closed—Acceptable Action."

P-11-31

Develop, and incorporate into your public awareness program, written performance measurements and guidelines for evaluating the plan and for continuous program improvement.

The performance measurements and guidelines you described that have been included in PG&E's *Public Awareness Plan* satisfy the intent of Safety Recommendation P-11-31. Accordingly, this recommendation is classified "Closed—Acceptable Action."

Thank you for your commitment to pipeline safety. We encourage you to electronically submit periodic updates on progress being made to implement the remaining recommendations from the San Bruno accident (Safety Recommendations P-10-4; P-11-26, -27, -29 and -30) at the following e-mail address: [correspondence@ntsb.gov](mailto:correspondence@ntsb.gov). Please do not submit both an electronic copy and a hard copy of the same response.

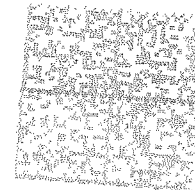
Sincerely,



Deborah A.P. Hersman  
Chairman

NATIONAL TRANSPORTATION SAFETY BOARD  
OFFICE OF THE CHAIRMAN  
WASHINGTON, D.C. 20594

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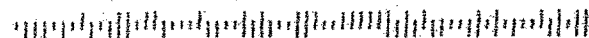
03/14/2013

Mailed From 20594

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