

From: Magee, Charles H.
Sent: 5/15/2014 12:26:54 PM
To: Doll, Laura (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=LRDD)
Cc: Bruno, Kenneth (kenneth.bruno@cpuc.ca.gov); Colvin, Michael (michael.colvin@cpuc.ca.gov)
Bcc:
Subject: Review of PG&E Gas O&M Procedures

Hi Laura,

GSRB conducted an OM&E gas audit in 2012. One of the findings of that audit was that there was no written Continuing Surveillance procedure, as required by 49 CFR 192.613. By June of 2013, PG&E had written TD-4800S (attached) to correct this deficiency. While evaluating the procedure, I noticed that Table 1 of the procedure seemed to be very brief. As a result, I reviewed all of the PG&E O&M procedures in our possession to determine if additional documents should be included in Table 1. I soon realized that there seemed to be many O&M procedures which generated information and data which appeared to be valuable to the Integrity Management program, the Risk Assessment and Asset Management programs, but many of the procedures didn't seem to direct the information/data to those programs. Instead, it appeared that it was up to the personnel of those programs to go find it. In fact, the TIMP procedure says that the program is based on an annual review of records. This is not only inefficient but valuable information is likely to never be found. This information/data should instead be "pushed" to those programs. Two things have to happen to make this work. First, there needs to be a step at the end of procedures to instruct the readers to route the data/information to the programs who need it. The instructions need to include directions on how to do that. Second, you need a good Information Management computer system which can be used to record the information and allow users to route information between groups. It could be that you now have the Information Management system. I believe that all of PG&E now uses SAP. I don't know if everyone at PG&E has access to it yet or not.

Since the 1980s, DCPD has had such an information management system. Until recently, it was called PIMS (Plant Information Management System). I believe DCPD has also now gone to SAP. Once information was entered into the program, it could not be deleted (except by IT after management approval). As a result, there is an indelible record of everything that has gone on at the plant, from engineering evaluations, to design changes, to test results, etc. For example, if a member of operations needed an engineering evaluation of a deficient part, test results, or design change, he/she could simply route the request to engineering by entering the information into the computer and typing the engineering group's 4 digit computer code. The engineering group would get the request as soon as it was entered into the computer. I believe that all gas systems need to have this type of information management program and procedures

that route or “push” information to the programs that need it.

In the Word attachment to this e-mail, you will find my review. The text in red are my comments. In most cases, you will also see the word “missing”. That means that the procedure, bulletin, etc. doesn’t appear in Table 1 of TD-4800S. The text in blue is for procedures, bulletins, etc. that do appear in Table 1 of TD-4800s. The text in red with those procedures are my comments about it. (Note – Some of the Xs may be in the wrong boxes, however what is most important is what is written in the column titled SED RAU Comments)

I performed this review between December 2013 and March of 2014. It’s quite possible that PG&E has been conducting the same review, so some of this could be old news. However, it could be useful as a double check to determine if PG&E’s review missed anything. Please route this e-mail to the appropriate people in PG&E’s Gas Division. After they’ve had time to review it, I would like to meet with you to discuss it. In the meantime, if anyone has any comments or questions, feel free to forward them to me.

Thanks,

Chuck

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