Review of TD-4800 S Table 1							
Document	**Identification**	**O&M**	**Condition Evaluation**	**Corrective Maintenance**	**Post Evaluation**	**SED RAU Comments**	**Reviewed**
Bulletin Number: 187 Rev.1, FOR IMMEDIATE RELEASE Date: 11/06/06, Gas Information Bulletin, Title: Gas Transmission Pipelines with Elevated 3rd Party Threats	X	X	X	X	X	Missing – The bulletin states, "This revised Bulletin cancels and supersedes GIB 187, Pipelines with Elevated 3rd Party Threats, dated 9/28/04. **Purpose** The purpose of this Gas Information Bulletin is to ensure a consistent process will be used for identifying, assessing, and documenting actions taken on pipeline locations identified with elevated third party threat." This bulletin has specific tasks for the Risk Management Team.	X
SCM-2106S w/att. 1 – Rev. 0, 3/13/2012 "Material Problem Reporting Standard"	X	x	x	X	X	Missing - PG&E Standard "Material Problem Reporting" is very Important and missing from this Table. Material Problem reports are used to report problems in some of the documents below.	x
SCM-2106P-01 w/att. 1 &2 – Rev. 0, 3/13/2012 "Material Problem Report Procedure"	x	x	x	X	X	Missing - PG&E Standard "Material Problem Reporting" is very Important and missing from this Table. Attachment 2 contains a "Human Safety and Major System Reliability" matrix to evaluate the risks from the failed components. It's not clear how the Material Problem Reports get to Integrity Management engineers.	x
D-S0353 / S4112 – effective date 5/2000. Review date 5/2005 "Physical Inspection of Pipelines, Mains and Services"	X	X	X	X	?	Missing – Reports go to Facility Owners. How does information get to Integrity Management?	x

TD-4002P-02 Rev. 0, 12/14/2011 "General Work Plan and Execution for Gas Assets"		X		X		IM Engineers Need This – Not sure that gas asset changes, due to repairs and capital projects, get to Integrity Management. Integrity Management engineers need to be in on meetings and aware of the modifications being made to the system. As long as changes and repairs are made like-for-like with original specs, there will be no problem for Integrity Management. Also, work orders usually include component history (changes made to the component over time). Note: Risk Management Procedure – Gas Transmission Integrity Management Program RMP-17 is referenced in this procedure and it says that the Integrity Management and Technical Support Director is responsible for the maintenance program requirements	x
TD-4100P-05, Rev. 1, 9/15/2012 "Selection of Steel Pipeline Repair Methods"		X	X	X	x	IM Engineers Need This – Important information on evaluating steel gas transmission and distribution pipe defects per ASME B31.G and approved repair methods. Also includes record keeping requirements.	x
WP4100-04, "Gas Overbuilds", Date Issued/Updated: October 2008	X	X	X	X – Corrective Action	X	Missing – "Reporting Detected Gas Overbuilds- (1) The employee immediately reports to the appropriate supervisor any conditions that could result in imminent danger to life or property, including but not limited to leak indications (see UO Standard S4110 "Leak Survey and Repair of Gas Transmission and Distribution Facilities").	X
463-3, "Effective Date: 5/1/83, "GAS PIPE CROSSING OF STATE HIGHWAYS AND FREEWAYS"	X					IM Engineers Need This – IM should be aware of these design requirements.	X
TD-4110B-004, Rev. 1, 3/21/2011 "New Gas Leak Forms and Instructions"	X	X	X			Missing – The bulletin states, "The new forms, the changes to IGIS and the implementation of NLIS will increase compliance with required field data collection. They will also provide more complete information that can be used in making strategic system decisions. The implementation of NLIS will now allow all pipe inspections to be placed in a database, thus improving access to the data." Note – The 4 attachments are missing. Also, I don't see this bulletin incorporated into TD 4110P-11 yet. The bulletin says TD 4110P-11 is under development.	X

TD-4110B-05, Rev. 0, dated 12/23/2010, including Attachment 1, "Reporting Grade 1 Leaks on Mechanical Fittings"	X	X	X			Missing – The bulletin states, "***Reporting Process*** It is mandatory that all Grade 1 leaks on mechanical fittings be reported with a Material Problem Report (MPR) in addition to the A-form. Supervisors are responsible for ensuring that this process is followed. 1) Complete a Material Problem Report (MPR). This may be completed and submitted online at http://mpr/mpr 2) Follow the attached instructions for filling out and submitting the MPR. There is additional information above and beyond what is normally required of an MPR for a fitting failure. Please ensure the attachment is reviewed and as much information as possible is captured. 3) Label or tag the fitting with the MPR number and the leak number, and place it in a bag or box. 4) Send the failed mechanical fitting through company mail to 3400 Crow Canyon Road, San Ramon Attention: MPR Material for Shed" Also, I don't see this bulletin incorporated into TD 4110P-11 yet. The bulletin says TD 4110P-11 is under development.	X
TD-4110B-07, Rev. 2, 10/21/2011 "Leak Survey Method Requirements"	X	X	X			Missing – This bulletin requires those people performing gas leak surveys to produce auditable records which IM will need.	X
TD-4436P-04, Rev. 1, 10/19/2012 "CRM – Management of Pipeline Changes Procedure"	X	X	X			IM Engineers Need This – IM Engineers do not appear to be in the loop when physical changes are being made to the gas pipeline system.	X
TD-4436P-05, Rev. 1, 10/19/2012 "CRM – Evaluating Operational Experiences Procedure"	X	X	X	X – Corrective Action		Missing – This procedure includes evaluating Abnormal Operating Conditions (AOC) which may: • Indicate a condition exceeding design limits • Result in hazards to persons, property, or the environment Monitoring unusual operating or maintenance conditions is part of Continuing Surveillance (49CFR192.613)	X

S 4411, "Inspection of Underground Gas Holders", Revision 1.1, Effective Date: 1 August 1998, Review Date: 1 August 2000	X	X	X	X		Missing – Inspecting and recording the condition of high pressure underground gas holders and associated valves and equipment. Monthly, annually and 10 year inspections are required. The condition of this equipment is important to Continuing Surveillance and Integrity Management engineers.	X
S5000, Effective Date 04/2002, Review Date 04/2007, "Gas Distribution Emergency Shutdown Zones."	X					IM Engineers Need This – It would seem that IM may need to be part of the approval process of these zones. 1. Zones shall not be greater than 500 services in all locations having buildings that are predominantly four stories or higher and/or are wall-to-wall paved in major, metropolitan downtown business and commercial areas. 2. In all other locations, zones shall not be greater than 40,000 services. If the shutdown of one zone affects the shutdown of a downstream system or systems, including a high-pressure system affecting a low-pressure system, the number of services of all affected zones or systems shall be included in the total count. A rib and associated taps running through a zone may be maintained so that an upstream system does not affect the shutdown of a downstream system. 3. In localized areas that have an extreme likelihood or history of natural disasters (e.g., faults, landslides, liquefaction, wildfire potential, etc.), additional zones may be established. 4. Natural physical boundaries, such as rivers, mountains, and highways, shall be taken into account when establishing zone boundaries.	X
TD-4430B-001, 8/26/10, Gas Information Bulletin, "Establishing Alternate Means of Control (AMC) for Inoperable Valves"	X	X	X	X		Missing - When inoperable valves are found they should be reported to IM engineers to be logged and tracked. This is important data for Risk Assessment. Also, the Bulletin says, "This bulletin will be incorporated in the next revision of WP4430-04. Upon incorporation with the procedure, this bulletin will be canceled." WP4430-04 is dated March 2009 so I know this hasn't been updated.	

TD-4430B-004, Publication Date: 04/18/2012 Rev: 0 Gas Transmission Station Regulator and Monitor Set Points	X	X	X	X		IM Engineers Need This - Gas Control sends a confirming email documenting the set point changes to the Manager of Station Engineering, the Manager of Pipeline Engineering, the Manager of GSP, the **Manager of Transmission Integrity Management**, the Facility/Pipeline Engineer, the local field supervisor, and to **Regulation and OPP Device Settings** (a special email address set up for this purpose which is monitored by the Manager of Station Engineering). IM needs to know what the setpoints are. What happens when set points are found to have been too high? IM needs to know.	X
TD-9500P-16, Rev. 1, 6/1/2012, "Deactivation and/or Retirement of Underground Gas Facilities"	X	X				IM Engineers Need This – It would seem that IM should have a say in approving these methods and also know what infrastructure is being deactivated/abandoned. Maybe the find this from reviewing as-built drawings. Not sure.	X
TD-1465S, Rev. 0, Publication Date: 07/15/2011, " Event Reporting for Gas and Electric Transmission and Distribution"	X	X	X	X – Corrective Action	X	Missing - Compliance with this standard ensures that records are prepared properly and consistently to document and communicate major equipment failures, active human failures, and external contacts that affect Company gas and electric facilities. Superintendents and managers within the ED, E&O, and ISTS lines of business are responsible for implementing this standard. Its effectiveness may be judged by the extent these managers and superintendents are able to identify trends and recommend actions that improve safety and reliable delivery of energy to customers.	X
TD-1465P-02, Rev. 0, Publication Date: 07/15/2011, "Gas Event Reporting"	X	X	X	X – Corrective Action	X	Missing – This procedure contains event reporting criteria for the above TD-1465S. It also contains criteria for what is a near-hit event. The procedure describes how to fill out and file the reports.	X
TD-4110P-20, Rev. 0, Publication Date: 08/16/2011, "Leak Survey of Inaccessible Pipelines Under Waterways"	X	X	X			Missing – The procedure contains instructions for leak surveying pipelines under water. If a leak is detected the person is instructed to go to Procedure TD-4110P-09, "Leak Grading and Response", which is further down in this table.	X
TD-4125P-05, Rev. 0, Publication Date: 03/31/2010, "Recording Pressures in Distribution Gas Systems"	X	X	X			Missing – This procedure contains instructions for recording and maintaining records for the pressures in the gas distribution system, including over-pressurizations.	X

TD-4125P-04, Publication Date: 03/31/2010 Rev: 0, "Revising the MAOP, MOP, and FDP of Pipelines Operating at Greater Than 60 PSIG"		X				Note – Does not incorporate Bulletin TD-4125B-001 yet. The bulletin has a later date than the procedure.	X
TD-4413S, Rev. 0, Publication Date: 08/11/2010, "Gas Event Reporting Requirements" Including TD-4413B-001	X	X	X			Missing - This utility standard is the governing document for reporting gas events to the CPUC and DOT occurring within Pacific Gas and Electric Company (Company) gas systems. It establishes criteria, requirements, and procedures for reporting and documenting gas events, including safety-related events.	X
TD-4413P-01, Rev. 0, Publication Date: 08/11/10, "Procedure for Reportable Gas Incidents"	X	X	X			Missing – Procedure for reporting gas incidents described in TD-4413S, Rev.0, above.	X
TD-4413P-02, Rev. 0, Publication Date: 08/11/2010, "Procedure for Reporting Safety-Related Conditions and Low-Pressure System Problems"	X	X	X	X – Corrective Action		Missing – Procedure for reporting safety-related and low pressure gas incidents described in TD-4413S, Rev.0, above.	X
TD-4413P-03, Rev. 0, Publication Date: 08/11/2010, "Annual and Quarterly Reporting Requirements for Gas Incidents, Events, and Activities" Include TD-4413B-01	X	X	X	x		Missing - This procedure establishes a uniform system for submitting to DOT and the CPUC, required Pacific Gas and Electric Company (the Company) quarterly and annual reports for gas incidents and activities.	X
TD-4550P-20, Rev. 0, Publication Date: 09/14/2011, "Annual Gas Well Survey Procedures"	X	X	X	X		Missing – Inspection, repair and reporting of leaks in gas storage wells.	X
4430 Revision: 1.1, Effective Date, 01 Oct 1999, Review Date, 01 Oct 2001, " CGT GAS FACILITIES REQUIREMENTS"	X	X	X	X		Missing – Standard discusses inspection requirements and says, "The record of completed maintenance of station equipment shall be recorded and kept in accordance with CGT Standard 4432, "Station Inspection, Testing, and Maintenance Procedures." IM engineers need to know failure modes and frequency of failures and problems.	X
SP 463-4, Effective Date, 5/15/83, "Cover and Clearance Requirements for Transmission Lines, Mains and Service Lines."	X	X	X	x		IM Engineers Need This – Contains clearance requirements separating gas lines from underground electric utilities. IM needs to be aware of the clearances and approve them. Electric transmission lines can induce current in gas lines which can cause corrosion.	X

TD-4436P-06, Rev 1, Publication Date: 10/19/2012, "CRM—Gas Control Training Program"		X				**NOTE: It would be good for IM engineers to attend the Gas Control Training Program, Gas Systems Training and any other gas operations training programs. These training programs provide valuable insight to engineers on the operation of the gas system and its equipment, especially safety-related equipment and how the equipment works together. It also provides training to the engineers on abnormal and emergency operating conditions and modes. The engineers develop a sense of ownership.**	X
TD-4436S, Rev. 1, Publication Date: 10/19/2012, "Gas System Operations Control Room Management Standard"	X	X	X	X – Corrective Action		Missing – Control Room Records must be kept for 7 years. Records include any abnormal or emergency conditions experienced.	X
TD-4436P-01, Rev. 1, Publication Date: 10/19/2012, "CRM – Information Management Procedure"		X				Missing – Not really sure this procedure is that useful to IM but it does say, "The secondary audience for this document includes personnel in gas maintenance and construction (M&C**), gas engineering,** and gas control strategy and support (SCADA) who have responsibilities described in this procedure."	X
TD-9550S, Rev. 0, 05/09/2012, "Customized Gas Engineering Design, Construction, and Project Requirements", including TD-9550P-01 and 02	X	x	X	X – Corrective Action		IM Engineers Need This – IM engineers must be cognizant of design changes. IM Engineers need to be in the loop when physical changes are being made to the gas pipeline system. Not clear if this is happening. How will the changes affect the IM Risk Assessment? TD-9550P-02 says, "**Safety** Following this procedure as written minimizes the risk of a design integrity issues or construction hazards to personnel, the public, or equipment. Design integrity issues can be minimized or eliminated through proper use of government laws and regulations, as well as industry and Company standards. Personnel must keep public and personnel safety risks in mind when performing the steps in this procedure."	X
EG4124, Emergency Pre-tested Transmission Pipe, Rev. 2, Effective Date , 01 Jan. 1999, Review Date, 01 Jan. 2001				X		IM Engineers Need This - Does IM need to know when pipe is being replaced? How is IM notified?	X

G14136, "CGT Emergency Sleeves Program", Effective Date: 8-05, Review Date: 8-10:				X		IM Engineers Need This - Does IM need to know when sleeves are being replaced or added? How is IM notified?	X
WP4050-01, "Entry, Inspections, Response to Threats, and Security Maintenance Requirements for Gas Transmission Facilities", Effective Date: November 2007	X	X	X	X		Missing - IM needs to know when security is becoming a problem	X
S4433, "Gas Pressure Relief Devices - Responsibility for Annual Inspection and Capacity Verification", Rev. 1, Effective Date: 3/1/98, Review Date: Mar 1, 2000	X	X	X	X		Missing – All defective relief devices need to be reported to IM. This is important data needed to conduct risk assessments. It needs to be logged and tracked. The procedure states, "Any relief device found to be defective shall be replaced. If the relief device is found to have insufficient capacity: a. It shall be replaced or b. An additional device shall be installed. Data about the pressure relief devices installed, such as manufacturer, model, inlet, and outlet size, orifice size, and set pressure shall be verified at the time of inspection."	X
139, "Maintaining Air Tank Reliefs", Rev 1, 9/20/05	X	X	X	X		Missing – Rates of defective relief valves be tracked by IM engineers?	X
WP4050-02, "Obtaining and Controlling Access to Gas Transmission Facilities", Nov. 2007		X				Question – How do you decide if a contractor can be trusted to have unescorted access? What is your screening criteria?	X
RP 4460.1, Rev. 1, Eff. Date 1/1/98, Review Date 1/1/2000, "Recommended Practice Subject: Operating Maps and Operating Diagrams, Preparation of"		X				IM Engineers Need This - No mention of how the updated drawings are distributed. Do IM engineers have on-line access?	X
4431 Revision: 2, "OPERATION AND MAINTENANCE INSTRUCTIONS REQUIREMENTS FOR MAJOR GAS FACILITIES", Effective Date:1/10/99, Review Date:1/10/01		X				IM Engineers Need This – Design changes - On the flow chart for design changes, I see coordination with Pipeline Engineering but not Integrity Management Engineers. IM Engineers included in Pipeline Engineering?	X
Work Procedure WP4300-11, ISSUING DATE ISSUED/UPDATED: **4-07, "Operational and Fuel Meter Requirements and Maintenance"**	X	X	X			Missing – The procedure mentions internal pipe inspections but it doesn't say what happens to the results of the inspections. IM engineers may need to know the results.	X

Utility Work Procedure WP4300-07, "Orifice Metering System Maintenance for Gas Wells",: Date Issued/Updated: November 2007	X	X	X			Missing – The procedure includes relief valve testing and maintenance. Reports of valve malfunctions or failures should also be sent to IM engineers for tracking.	X
TD-4300P-05, Publication Date: 07/11/2012 Rev: 1, "Performance Check and Maintenance of Rotary Gas Meters > 1000 CFH"	X	X	X			Missing - I think this is one of the few times that I've seen instructions telling staff to input results of an inspection or needed maintenance into a computer (SAP or otherwise) where other people can access and act on it. "4.2 Enter all applicable rotary meters requiring maintenance in a facility maintenance master file using software such as the Gas FM (*Gas FM is a scheduling tool for facility maintenance)* application or SAP Work Management (WM) software." This needs to be a step in all procedures that address hardware operation, maintenance or failure issues.	X
Utility Procedure: TD-4413P-01, Publication Date: 08/11/10 Rev: 0, "Procedure for Reportable Gas Incidents"	X	X	X	X		Missing – Section 4.2 says, "Whenever the gas T&D organization holds a full investigation or critique for a gas incident that involves work-procedure error, the system reliability and support organization must be included for determining the root cause and developing the corrective or preventative action plan." Does this include your Asset Management/ Risk/ IM engineers? The incident must also be reported to them.	X
WP4300-04, "Performance Checks and Maintenance of Turbine Gas Meters", January 2008	X	X	X	X		Missing – Where do you report valve failures? Similar to TD4300-05 above, the technician should be able to report meter failures on-line for the IM engineers to track and trend.	X
EMER-1011M, "Gas Emergency Response Plan."	X			X			
EMER-6010S, "Training and Exercising Gas Emergency Response Plan."				X			
H-70 "Pressure-Relief Devices."		X	X				
O-16, "Corrosion Control of Gas Facilities."		X	X	X			
RMI-04, "Gas Transmission Earthquake Plan and Response Procedure."	X	X	X				
RMI-04A, "Gas Transmission Rainfall Plan and Response Instruction."	X	X	X				

RMI-04B, "Gas Distribution Earthquake Plan and Response Procedure."	X	X	X				
RMP-06, "Gas Transmission Integrity Management Program."			X			Comment – Information needs to be pushed to IM Engineers by O&M and Engineering via an information management system rather than have IM Engineers search for it.	
RMP-15, "Gas Distribution Integrity Management Program."			X			Comment – Information needs to be pushed to IM Engineers by O&M and Engineering via an information management system rather than have IM Engineers search for it.	
TD-4020S, "Gas Operations Corrective Action Program."	X	X	X				
TD-4050S, "Security Standard for Gas Operations."		X				Comment – Also need to notify Asset Management/ Risk Assessment of any changes to the procedure.	X
S4110, "Leak Survey and Repair of Gas Transmission and Distribution Facilities." Effective Date 10/2005 Review Date 10/2010		X	X	X		I don't see Gas Distribution Bulletins 250, 254 and 271 incorporated into S4110 yet. Do IM engineers run the Leak Performance Summary Reports and Leak Activity Reports from IGIS? There is no mention of IM in this procedure. What specifically, do the Distribution IM engineers look at to evaluate risks? Where is it documented?	x
TD-4110P-06, "Field Inspection of Gas Facilities."	X	X				I don't see Gas Distribution Bulletin 271, Rev. 2, "Leak Survey and Field Inspections Stamp" incorporated into S4110P-06 yet. Not sure what records IM uses. Not mentioned in the procedure. This procedure references TD-4110P-04, "Leak Survey Procedures for CGI". I don't see it in the PG&E procedures.	X
TD-4110P-09, "Leak Grading and Response."	X	X	X			It's not clear from the procedure where to find the records that IM will be reviewing.	X
TD-4110P-12, Date: 12/15/2010 Rev: 1, "Subsurface Leak Grading"	X	X	X	X		Missing - This document describes the procedures to follow when an operator-qualified leak survey person or a competent first responder detects a subsurface leak indication.	X
TD-4110P-13, "Outside Gas Leak and Odor Investigation", Publication Date: 11/10/2010 Rev: 0	X	X	X			Missing – Do the RCAs for gas leaks go to the IM engineers? They should be tracked and trended.	X

WP4330-06, Date Issued/Updated: March 2008, Title: Sulfur Safety Procedures for Natural Gas	X	X	X	X		Missing – The IM engineers should know where sulfur is accumulating since it can form sulfuric acid and corrode the pipe.	X
TD-4125S, "Maximum Allowable Operating Pressure Requirements for Gas Distribution Systems and Transmission and Gathering Lines."				X			
TD-4125P-02, Rev. 0, "Establishment and Documentation of MAOPs, MOPs, and FDPs for Pipelines Operating at Greater Than 60 PSIG", Publication Date: 03/31/2010		X				Missing – For transmission lines, changes to MAOP are documented in these files	X
TD-4125P-03, "Revising the MAOP of Pipelines Operating at 60 psig or Less."				X			
TD-4125P-04, "Revising the MOP, MAOP, of Pipelines Operating at Greater than 60 psig."				X			
TD-4125P-06, "Revising Setpoints of Overpressure Protection Devices"	X	X	X	X		Missing - IM Engineers Need This - The procedure says, "3. Records All completed forms requesting OPP device setpoint revision (Form TD-4125P-06-F01) must remain on file for the life of the facilities at the Walnut Creek Records Section. These forms must be kept in the appropriate station files." Also includes field verification and annual test results. IM Engineers need test failures.	X
TD-4127S, "Class Location Determination and Compliance Requirements."	X	X	X	X			
TD-4127P-01, "Observing, Reporting, and Evaluating New Construction and Conducting Class Location Studies."	X	X	X	X			
TD-4127P-02, "Conducting System-wide Class Location Review."			X	X			

S4412, "Prevent Damage to Underground Facilities."	X			X			
TD-4412P-03, "Marking and Locating PG&E Underground Facilities."		X					
WP4412-04, "Field Meets and Standby – Damage Prevention."		X					
TD-4412P-06, "Handling Excavators, Contractors, and the Public Working Unsafely Around Utility Facilities."		X					
TD-4412P-07, "Patrolling Pipelines and Mains."	X	X	X	X			
TD-4412P-09, "Gas Pipeline Markers."		X					
TD-4430B-002, Rev. 0, Publication Date: 03/04/2011, "Change in Transmission Station Monitor Testing Procedure"	X	X	X	X		Missing – This Bulletin changes the method of testing Monitors from increasing the set-point 5 psi ABOVE MAOP to reducing the set-point BELOW the MAOP. This bulletin is newer than the TD-4430P-02 procedure below. I am not sure that TD-4430P-02 has been revised yet. The bulletin says the procedure should have been revised by March of 2012.	X
UTILITY WORK PROCEDURE WP4330-02,Effective Date: March 2008, "Removal and Control of Liquids from Pipelines and Maintenance and Operation of Associated Gas Conditioning Equipment"	X	X	X	X		Missing – This procedure has to do with removing fluids in the pipeline that cause internal corrosion and inspecting for internal corrosion. IM Engineers should be made aware of the results.	X

Standard 4241, Revision 1.1, Effective Date: 01 Oct 1999, Review Date: 01 Oct 2001, " Station Protection System Impairment Procedure"	X	X	X	X		Missing – The standard states, "Objective - The procedure lists the measures that must be taken whenever an impairment to a station protection system is planned or discovered. These systems provide protection (both manual and automatic) for a wide variety of station equipment and structures. Scope - **The requirements apply to fire protection systems, gas detection systems, Emergency Shutdown (ESD) systems and unit/station shutdown and alarm systems in all CGT facilities.** This standard does not apply to routine testing or routine maintenance of these systems." The standard states, "3.4. The Area Operating Specialist shall upon receipt review the completed Station Protection System Impairment Report. Completed reports shall be kept on file by the Area Operating Specialist for a minimum of one year from the impairment end date." This is emergency equipment. These types of problems need to be tracked and trended so that failure prone equipment can be replaced. This report should go to Risk Management engineers to be used in their Risk Assessments.	X
TD-4100P-14, 04/27/2012 Rev: 0, "Removing, Documenting, and Preserving Gas Transmission Pipe and Components"	X	X	X			IM Engineers Need This -This work procedure includes test records, videos, pictures, etc. of defective pipe that has been removed. IM engineers need this data.	X
TD-4430P-02, "Gas Transmission Station Inspection, Testing, and Maintenance Procedures."		X				Does not incorporate the Bulletin 325 form or the changes from Bulletin TD-4430B-002, addition of leak survey form.	X
WP4430-04, "Gas Valve Maintenance Requirements and Procedures."		X	X				
S4446, "Vault Inspection Procedure."		X	X				
S4540, "Gas Pressure Regulation Maintenance Requirements." Including WP4540-01	X	X	X	X		**Comment - TD-4430B-002, Rev. 0, Publication Date: 03/04/2011, "Change in Transmission Station Monitor Testing Procedure" (above) does not allow testing of Monitor Valves above MAOP but WP4540-01 still requires MAOP +10%. Is this a conflict or is this situation different?**	X

Utility Procedure: TD-4540P-04, Effective: 1/1/2010, "Pilot-Operated Regulator Station Maintenance (Outlet Pressures > 60 psig)"	X	X	X	X		Procedure states, "K. For failed or problem equipment, fill out an online Material Problem Report as required by Utility Standard S2333, "Material Problem Reporting (MPR)." However, S2333 has been replaced with SCM-2106S, so 4540P needs to be revised. It's not clear how the MPR's or the valve maintenance sheet (if applicable) make it to the IM engineers. In addition SCM-2106S is not in the transmission procedures. It is in the Distribution procedures.	X
TD-4551S, "Station Critical Documentation."	X	X					
TD-6436S, "Gas and Electric Field Services and Dispatch and Scheduling Operating Practices."			X				
TD-6436P-12, "Handling Emergency Conditions Reported by Outside Agencies and Company Personnel."	X						
TD-6436P-27, "Gas Service Valve Inspection and Maintenance."			X				
WP4133-02, "Cathodic Protection Area Assessment/Resurvey Procedures for Gas Distribution."		X	X	X			

TD-4100P-10-JA06, "Clearance Checklist for Control Room Personnel" and TD-4100P-10, Gas Clearance Procedures for Facilities Operating Over 60 PSIG"		X				This is not needed for the Continuing Surveillance Program but in reviewing the checklist, I noticed that there is no Job Safety Analysis (JSA). JSA's are needed to anticipate what could go wrong during the work and decide what steps will need to be taken in case the negative incident occurs. For example, a work step that results in an unanticipated loss of power. If it happens people need to know exactly what to do immediately: not spend hours figuring out what to do next. JSAs should be considered in Work Planning. Also no references to CAL/OSHA lock out tag out Title 8 requirements. I don't think these two procedures comply because they don't lock out equipment to prevent it from operating. Also, equipment is not de-energized (lifted leads, etc.) it's just turned off. Refer to Cal/OSHA Division 1, Chapter 4, Subchapter 7, Group 2, Article 7, Section 3314, "§3314. The Control of Hazardous Energy for the Cleaning, Repairing, Servicing, Setting-Up, and Adjusting Operations of Prime Movers, Machinery and Equipment, Including Lockout/Tagout.	X
TD-4100P-10-JA03, Publication Date: 07/11/2012, Rev: 0 "Placing Man-on-Line, Caution, and Information Tags"		X				Same Comment as for TD-4100P-10-JA06, "Clearance Checklist for Control Room Personnel" and TD-4100P-10, Gas Clearance Procedures for Facilities Operating Over 60 PSIG", on the line above. This document does not conform to OSHA clearance processes.	X
Utility Procedure: TD-4550P-05, Publication Date: 06/13/2012 Rev: 1, "Procedure for Environmental Plans at Gas Transmission Facilities"	X	X	X			This may not be needed for Continuing Surveillance but it is definitely needed for your Risk Assessment Group. The procedure discusses inspections of GT facilities for hazardous substances. Some of these substances will be flammable and may be stored in quantities exceeding your permits. Obviously that would be hazardous to your GT facility. Right now it's not clear that anything would be reported to your Asset Management/Risk Assessment Unit.	X

UO Guideline G14281, ISSUING DEPARTMENT: Gas Engineering EFFECTIVE DATE: 5-06 UO SPONSOR: Director – Gas Engineering REVIEW DATE: 5-11 TITLE: Procedure for Revising Application Software for Microprocessor-Based Controls		X				PROBLEM - There are no cyber security precautions in this procedure, such as: 1. Never store company computer programs on private flash drives, only use company flash drives that have been scanned for viruses. 2. Never write code on home computers. Only write code on secure company computers with no internet/intranet access. 3. Never insert company flash drives into home computers. 4. Never insert private flash drives or storage devices into company computers. 5. All code that employees write must be scanned for viruses before the code is loaded onto the electronic devices (PLC's etc). 6. Always change the passwords on, or disconnect, vendor installed modems, internet connections, wireless cards, routers, etc. before loading revised software into micro-processor based controls.	X
UTILITY PROCEDURE WP4901, Date: February 2008, Title: SCADA RTU Installation on Gas Facilities		X				Note – I don't see any cyber security requirements. Should this procedure reference them?	X
UO Guideline G14272, EFFECTIVE DATE: 6-06 REVIEW DATE: 6-11TITLE: Selecting Instrument and Control Wires, and Tagging Wires, Cables, and Conduits for GT&D Facilities		X				Question – Is anyone tracking wiring, conduit and cable condition and failures?	X
S4130, Revision 1.1, Effective Date: 01 Nov. 1999, Review Date: 01 Nov. 2001, "Specification for Concrete Coating"						Question: What pipes are coated with concrete? The spec refers to AWWS, American Water Works Standard	X

Standard 4132, Revision: 1, Effective Date: 01 Feb. 2000, Review Date: 01 Feb. 2002, "Powercrete J Application Specification"						Missing - IM engineers should track failures of the Epoxy Coating, although this isn't the standard or procedure where this would be documented.	X