



**Pacific Gas and Electric Company**

# Gas Information Bulletin

**Title: Valve Classification (Compliance)**

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## Compliance Bulletin - Valves 2000 - 01

The purpose of this bulletin is to 1) document the application of 49 CFR 192 to valves installed in the CGT gas transmission system and 2) identify the associated actions required by the GSM&TS Work Management Group and districts.

### BACKGROUND

The maintenance frequency and requirements for transmission line valves are specified in various sections of 49 CFR 192 (Federal Pipeline Safety Regulations). Such valves are said to be "jurisdictional" and the maintenance records for these valves are subject to audit by the CPUC Utilities Safety Branch. It is left to the pipeline operator to identify the specific valves that meet the criteria specified in 49 CFR 192.

In 1999, as part of GSM&TS Maintenance Records Standardization project many gas transmission valves that were previously considered non-jurisdiction, were mistakenly classified in the maintenance management program as jurisdictional. In 2000, System Integrity evaluated the classification of transmission valves and the associated maintenance requirements.

### CATEGORIES OF VALVES

Valves installed in the CGT gas transmission system shall be placed into one of four categories:

1. Relief valves and valves in regulating service: Valves used to maintain service reliability or to provide overpressure protection. Valves in this category include, but are not limited to, relief valves (and other overpressure protection devices, excluding rupture discs), regulators, monitors, and load valve/trimmers. The maintenance frequency and requirements for these valves is mandated by 192.731 and 192.739, and detailed in GS&S F-11.
2. Valves needed for emergencies: Valves used to isolate a pipeline facility or pipeline section in the event of an emergency. An emergency is defined as:

“Any unsafe condition that requires the **immediate shut down and isolation** of an entire station or pipeline section in order to protect employees or the public, and to prevent or minimize equipment damage and property loss.”

Valves in this category include transmission main line valves (sectionalizing block valves required by 192.179), tap valves, valves on cross ties, station upstream and downstream block valves, blowdown valves, line rupture control valves, and all valves controlled by a station ESD system (varies by station, includes uphole safety valves at storage fields). Valves are typically open/close service and may be manually operated or power actuated. Maintenance requirements and frequencies for these valves are mandated in 192.745 and detailed in GS&S F-11.

3. Valves needed for operations: Valves used to facilitate system operations. Valves in this category include, but are not limited to, BTU zone isolation valves, MAOP separation valves, and valves used to change routing through a station (primarily terminals and compressor stations). Valves are typically open/close service and may be manually operated or power actuated. Maintenance requirements and frequencies for these valves are not specified in 49 CFR 192, but are specified in GS&S F-11.
4. Valves needed for maintenance: Valves used to isolate equipment in order to facilitate maintenance or repairs. Valves in this category include, but are not limited to, equipment isolation valves (e.g., separators, filters, coolers, etc.), block valves installed on either side of meter or individual regulator/monitor or load valve/trimmer runs, unit block valves (compressor stations), bypass valves (unless controlled by an ESD system), fuel gas valves (unless controlled by an ESD system), valves on gas well Christmas trees (except uphole safety valves, see category 2), tap valves for power and control gas, and valves on power gas or instrument supply piping (supply racks). Valves are typically open/close service and may be manually operated or power actuated. Maintenance requirements and frequencies for these valves are not specified in 49 CFR 192, but are specified in GS&S F-11.

### APPLICATION OF CODE SECTIONS

GSM&TS interprets 192.731 and 192.739 as applying only to valves that fall into category 1 (relief valves and valves in regulating service).

GSM&TS interprets 192.745 as applying only to valves that fall into category 2 (valves needed for emergencies) as described above.

The basis for the interpretation is the definition of “emergency.” As noted above in the discussion of category 2 valves, an emergency is defined as a situation that necessitates the immediate shutdown and isolation of the facility. This definition

excludes localized situations that might require shutdown or bypass of a particular piece of equipment, but not the entire station or pipeline section.

These localized situations are not considered emergencies, primarily because there is time to assess the problem and take the most effective action. Valves designated for operations or maintenance (categories 3 and 4) can usually be utilized to address the situation. Depending on the problem, the station may ultimately need to be shut down, but this can be done safely after the problem is assessed. This contrasts with an emergency where immediate shutdown and isolation needs to occur to prevent injury or property loss.

#### COMPATIBILITY WITH GS&S F-11 (REV #00)

GS&S F-11, "Valve Lubrication and Maintenance Requirements," specifies maintenance requirements and frequencies for valves "installed in, and determined to be necessary for the safe and reliable operation of, PG&E's gas systems." The valve category descriptions given above do not conflict with descriptions of valves covered in GS&S F-11. Although a valve may not, according to the determination made by CGT, be jurisdictional, it would still be subject to requirements and frequencies specified in GS&S F-11.

In the current revision of GS&S F-11, there are requirements applicable to jurisdictional valves, specifically valves in regulating service, that are more stringent than what is specified in 49 CFR 192. Where differences in requirements exist, the more stringent requirement applies.

#### ACTION:

As a result of recent reviews of GSM&TS standard requirements, we have established definitive criterion for the categorization of valves in our system. Valves will either be classified as relief valves or regulating valves (CPUC jurisdictional), Emergency Valves (CPUC jurisdictional), Operational Valves (not jurisdictional), and Maintenance Valves (not jurisdictional).

**Beginning immediately, the GSM&TS Work Management Group will work with each District to implement a review of the function of each valve in CGT system, and categorize them according to the established definition listed above.** The goal is to review all valves in all districts, assigning them the proper name, and also modify existing record keeping (including PLM and valve maintenance records) prior to the next 2001/2002 CPUC district audit.

Maintenance and Operational valves must still be maintained according to Gas Standard F-11, however will not be documented as CPUC jurisdictional. Jobs associated with these valves will be classified as "A" jobs, since GSM&TS standards currently require annual maintenance. Gas Standard F-11 will be revised in 2001 to

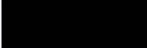
reflect these changes. The maintenance frequencies for Maintenance and Operational Valves will not be changed at this time, but will be subject to future review.

At present, no action is required for local transmission line valves maintained by Distribution since the valves previously identified by Divisions as "jurisdictional" did not change as part of the 1999 Maintenance Records Standardization Project. However, during the upcoming revision process of GS&S F-11 we will evaluate any impact to the local transmission line valves.

**Approved by:**

 Manager  
System Integrity Section, GSM&TS

**Date:** 01/31/01

**Author:**  PE

**If you have any questions about this bulletin, please call the employee(s) listed below:**

Contact(s):

LAN ID(s):

Phone(s):

