

August 19, 1970

Office of Pipeline Safety
Department of Transportation
800 Independence Avenue S.W.
Washington, D.C. 20590

Attention: Mr. William C. Jennings
Acting Director

Gentlemen:

Attached herein is a copy of this Commission's Decision No. 77623, authorizing Pacific Gas and Electric company to deviate from Section 5(d) (1) of General Order No. 94-A.

This transmittal is to serve the purpose of notification as required by Section 3 (e) of the Natural Gas Pipeline Safety Act of 1968.

Very truly yours,

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA

By (signed)

WILLIAM W. DUNLOP, Secretary

Enclosure

Incoming Attachments/Comments:
Decision No. 77623

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of PACIFIC GAS AND)	
ELECTRIC COMPANY for waiver of)	
obligation to comply with a)	Application No. 51964
provision of General Order 94-A,)	(Filed June 12, 1970)
Section 5 (d) (1), and for authority)	
to comply with substitute provision.)	
(Gas)		

O P I N I O N

Applicant's Request

By this application, filed June 12, 1970, Pacific Gas and Electric Company (Applicant) seeks authority to deviate from the requirements of General Order No. 94-A, covering the 10-year inspection requirements of its Modesto underground holder. The previous 10-year inspection of this holder was conducted in 1960 and the next 10-year inspection must be completed in 1970.

Said deviation will permit the required internal inspection of Applicant's gas holder, consisting of approximately 26,600 feet of 34-inch buried pipe comprising 26 separate vessels of varying lengths, by the use of ultrasonic testing equipment in lieu of the visual inspection required under the order. Under said deviation, Applicant will expose the pipe of the container selected (Exhibit A) for examination at each end and in the middle to examine visually the condition of the external coating and surface of the pipe and measure the wall thickness at representative locations for internal corrosion interpretation. The conditions revealed will then determine whether or not additional investigation is required.

Support for Deviation

The third paragraph under the heading "Additional Inspections" of Section 5 (d) (1) of General Order No. 94_A, presently specifies as follows:

"...The interior of at least one container of holders constructed entirely of pipe and fitting shall be inspected by removing the end closures and entering the container..."

And as a substitute therefor, Applicant proposes to perform the required inspections in 1970 of its Modesto holder in conformance with the following:

"...In lieu of internal inspection of holders constructed entirely of pipe and fittings, at least one container believed most subject to internal corrosion shall be inspected by suitable nondestructive test methods in at least three locations in order that examination for corrosion can be made ..."

Since the adoption of General order No. 94-A in 1952, nondestructive methods of holder inspection have been developed, in addition to physical entry, for examination of internal corrosion. Ultrasonic metal thickness gauges are available which will measure plate thickness with utmost accuracy. Inspection by ultrasonics is conducted on the outside pipe surface while

the holder remains in service, and any physical disconnection or cutting of the holder for physical entry or measuring the plate thickness is not required. Also, the ultrasonic testing procedure is preferred over the cutting of the holder because of its economy, its elimination of extensive repair welding and its elimination of hazards involved in crawling through relatively small pipes for long distances.

The Commission, by Resolution No. G-1337 dated September 6, 1966, and again by Decision No. 75633, dated May 2, 1969, authorized a similar deviation for this Applicant from General Order No. 94-A to permit the use of this type of inspection in lieu of internal inspection for hydrocarbon storage vessels.

Finding and Conclusion

The Commission finds that the proposed deviation will result in an acceptable alternative to the type of inspection required under General Order No. 94-A and concludes that the application should be granted. Applicant is placed on notice, however, that if the results of any test indicate the holder to be in a defective or hazardous condition, it shall be removed from service, repaired and tested in accordance with requirements of the USA Standard Code for Pressure Piping before it is again placed in service.

A copy of this decision will be transmitted to the Department of Transportation pursuant to the requirement of Section 3 (e) of the Natural Gas Pipeline Safety Act of 1968.

Public Notice has been given on the application, affording interested parties an opportunity for hearing; no requests for hearing have been received by the Commission. A public hearing is not necessary.

O R D E R

IT IS ORDERED that:

Pacific Gas and Electric Company is authorized to carry out the inspection of its underground storage holder located at Modesto in accordance with the procedures set forth in its application filed June 12, 1970.

The effective date of this order shall be sixty days after the date hereof.

Dated at San Francisco, California, this 18th day of August, 1970.

J.P. VUKASIN, Jr.
Chairman
A.W. GATOV
WILLIAM SYMONS, JR.
THOMAS MORAN
VERNON L. STURGEON
Commissioners

Outgoing Text:

September 14, 1970

Mr. William W. Dunlop
Secretary
California Public Utilities Commission
350 McAllister Street
San Francisco, California 94102

Re: File A-51964

Dear Mr. Dunlop:

The Office of Pipeline Safety will interpose no objection to your Commission's Decision No. 77623, authorizing the Pacific Gas and Electric Company to deviate from Section 5 (d) (1) of the Commission's General Order 94-A.

Sincerely,

/Signed/

Joseph C. Caldwell
Director, Acting
Office of Pipeline Safety

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