



**Guidance Document Analysis (GDA)**  
**For Non-Clearance Routine (NCR) Transmission Work**  
**TD-4441P-15, Rev: 0**

<b>Document Type</b>	Utility Procedure
<b>Document Author</b>	Robert Quijalvo, Jr.
<b>Document Owner</b>	Stephanie Uhlich
<b>Document Approver</b>	Keith Slibsager

**Section 1: Planning**

1. Is the guidance document new or revised? If it is revised, what will change?

This is a new utility procedure that (along with TD-4441P-10, "System Clearances for Gas Transmission Facilities" and TD-4441P-11, "Maintenance Clearances for Gas Transmission Facilities") supersedes Utility Procedure TD-4100P-10, "Gas Clearance Procedures for Facilities Operating Over 60 psig," Rev. 2, issued 03/26/2014. This procedure supersedes Job Aid TD-4100P-10-JA01. Information incorporated from TD-4100P-10-JA01 includes the following:

- Converted from job aid to utility procedure.
- Named new procedure "Non-Clearance Routine (NCR) Transmission Work"
- Performed general technical writing for clarity throughout.

2. Why is the guidance document being written / revised?

When TD-4100P-10 was broken into separate procedures based on clearance types, it became logical to move the information previously contained in TD-4100P-10-JA01 into a separate utility procedure under Utility Standard TD-4441S, "Gas Clearances."

3. What is the scope?

This utility procedure identifies and limits routine Pacific Gas and Electric Company (PG&E or Company) system and maintenance work that may be performed without a clearance on natural gas transmission facilities.



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4. What are the regulatory requirements or other commitments that this guidance document will address?

This utility procedure satisfies applicable requirements of [Code of Federal Regulation \(CFR\) Title 49, Transportation, Part 192—Transportation of Natural and other Gas by Pipeline: Minimum Federal Safety Standards, §192.605, “Procedural manual for operations, maintenance, and emergencies.”](#)

[CFR Title 49, Transportation, Part 192—Transportation of Natural and other Gas by Pipeline: Minimum Federal Safety Standards, §192.631 “Control room management”](#)

For Gas Operations documents: Answer the questions to the four part test to determine whether the changes will impact OQ qualifications (covered tasks). Consult the OQ team as necessary. A covered task may be impacted (or created) if the change meets ALL FOUR of the following:

- A. Is the task performed on a pipeline facility? **Yes**
- B. Is the task an operations or maintenance task? **Yes**
- C. Is the task performed as a requirement of 49 CFR Part 192? **Yes**
- D. Does the task affect the operation or integrity of the pipeline? **Yes**

Various OQs may be required, depending on the equipment used in performing the work.

5. Are there any specific safety, health, or environmental issues that need to be addressed?

Potential hazards associated with performing NCR work on gas transmission facilities include, but are not necessarily limited to, the following conditions and situations:

- Explosion or ignition of escaping gas
- Traffic hazards when working on facilities near vehicles or roadways
- Hazards associated with working in confined spaces

6. Who will be required to comply?

All personnel who perform work or provide support for work on PG&E natural gas transmission facilities and associated assets, including but not limited to:

- Gas control center (GCC) personnel (gas transmission control center [GTCC] and gas distribution control center [GDCC])
- Maintenance and construction (M&C) personnel
- Gas pipeline operations and maintenance (GPO&M) personnel
- General construction (GC) personnel
- Pipeline field services personnel
- Gas system planning personnel
- Gas transmission engineering and design (GTE&D) personnel
- Facility integrity management program (FIMP) and technical services personnel
- Project management and major programs personnel



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TD-4441P-15, Rev: 0

7. What are the expected resources needed to comply (e.g., training development and delivery costs, costs for materials or technology, additional human resources)?

Resources for implementing this utility procedure as part of the hazardous energy control (lockout/tagout [LOTO]) and clearance alignment Scrum Works are Tactile (SWAT) include the following estimates:

- \$195,000 for updates to clearance training curriculum development (TD-4441P-01, P-10, P-11, and P-15)
  - Although training is not required to comply with this procedure, transmission clearance training mentions NCR work.

8. How will this document be communicated and distributed? When?

A Gas TDM Comms email will be sent after the last of the Scrum Works are Tactile (SWAT) TD-4441 bundle publishes to communicate that they are now all available in the Technical Information Library (TIL).

**A. Why communicate?** To inform personnel that Job Aid TD- 4100P-10-JA01 will be canceled by this document. There are no overall process changes.

**B. Who needs to know about it?** The same personnel listed in question 6 above.

**C. What are the key messages?** This utility procedure identifies and limits routine PG&E system and maintenance work that may be performed without a clearance on natural gas transmission facilities. It contains the information that used to be found in the now superseded Job Aid TD-4100P-10-JA01, "Non-Clearance - Routine (NCR) Work," which will be cancelled upon publication of this procedure.

**D. When is the effective date?** 03/01/2016. However, after the document is published on the TIL, trained personnel may begin to use it. This provides time to train impacted employees, purchase new materials as necessary, and use the new process before the effective date. The procedure becomes mandatory for all gas operations personnel on 03/01/2016.

**E. What else do they (your audiences) need to do?** Impacted personnel must read this procedure and become familiar with its location on the Technical Information Library (TIL).

**F. Which manual does this apply to?** *Gas Transmission Maintenance and Operations Manual.*

9. What keywords will employees use to search for this document?

Gas transmission control center, GTCC, gas, gas control, transmission, pipeline, clearance, non-clearance routine, NCR

10. Will formal sign off by the members of the target audience be required?

No.

11. What follow-up actions are needed?

NA



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12. What other options have been considered?

NA

13. Who needs to review and concur?

Susan Minarcin, Stephanie Uhlich, Robert Quijalvo, Tuesdai Powers, Keith Slibsager, and Jerrod Meier

14. How often will the guidance document be reviewed?

At least once every calendar year, not exceeding 15 months, to the date.

**Section 2: Guidance Document Consistency Check**

List in the table below existing guidance related to or affected by the proposed new guidance document. The author determines what actions must be taken to ensure existing resources are consistent with the new guidance document and will remain so.

If there are inconsistencies or uncertainty about whether the other resources will remain in-sync with the new document, the author develops a plan to address the situation and documents it here.

Name, Location, and Effective Date	Consistent?	Recommended Action	Responsible Person	Action Due
<a href="#">TD-4441S, "Gas Clearances"</a>	Yes	NA	Brandon Ham, Robert Quijalvo Jr., Stephanie Uhlich	NA
<a href="#">TD-4441P-10, "System New Clearances for Gas Transmission Facilities"</a>	Yes	NA	Robert Quijalvo Jr., Stephanie Uhlich	NA
<a href="#">TD-4441P-11, "System Maintenance Clearances for Gas Transmission Facilities"</a>	Yes	NA	Robert Quijalvo Jr., Stephanie Uhlich	NA
<a href="#">TD-4441P-20, "Hazardous Energy Control (Lockout/Tagout) for Gas Clearances"</a>	Yes	NA	Russell Grandmont II, Stephanie Uhlich	NA



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**TD-4441P-15, Rev: 0**

**Section 3: Compliance Monitoring**

<b>Mechanism(s) for Monitoring Compliance</b>	<b>Responsible Person</b>
Annual Enterprise Compliance Tracking System (ECTS) review	Robert Quijalvo

**Section 4: Stakeholder / Subject Matter Expert Review**

<b>Name</b>	<b>Department</b>	<b>Date of Review</b>
Robert Quijalvo, Jr.	GDCC	09/2015
Keith Slibsager	GCC	09/2015
Stephanie Uhlich	Standards and Procedures	09/2015

<b>Transmission Clearances SWAT Team</b>		
<b>Name</b>	<b>Department</b>	<b>Date of Review</b>
Bradley Spainhower	GPOM	09/14/2015
Curt Klippenstein	GPOM	09/14/2015
Dave Campbell	M&C - GPO&M	09/14/2015
David Kuryla	TPCO Central	09/14/2015
Gregory Flowers	TPCO Central	09/14/2015
Moriah McCarvel	Gas System Planning	09/14/2015
Teresa Duddy	Gas System Planning – Backbone	09/14/2015