

Woodard, Marina (UTC)

From: Imad, Antoinette M -Toni <antoinette.imad@pse.com>
Sent: Friday, February 03, 2012 4:46 PM
To: Lykken, David (UTC)
Cc: Woodard, Marina (UTC); McGrath, Cheryl; Subsits, Joe (UTC); Gas Compliance -- mail --
Subject: PG-11042 | 2011 Standard Natural Gas Inspection-Thurston/Lewis County
Attachments: PG11042 PSE Response Thurston Lewis County Inspection.pdf

Dear Mr. Lykken,

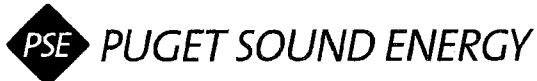
Pursuant to your request, PSE is hereby submitting a response to address findings noted in the Thurston/Lewis County inspection report dated January 5, 2012.

Best Regards,

Toni Imad

Antoinette Imad, P.E.
Consulting Engineer, Compliance
PUGET SOUND ENERGY
425-456-2970 tel
425-213-6219 cell
355 110th Ave NE EST-07W
Bellevue, WA 98004
www.PSE.com

RECEIVED
FEB 03 2012
State of Washington
UTC
Pipeline Safety Program



Puget Sound Energy
P.O. Box 97034
Bellevue, WA 98009-9734
PSE.com

February 3, 2012

David Lykken
Pipeline Safety Director
Washington Utilities and Transportation Commission
Pipeline Safety Section
1300 S. Evergreen Park Drive S.W.
PO Box 47250
Olympia, WA 98504-7250

RECEIVED

FEB 03 2012

State of Washington
UTC
Pipeline Safety Program

Dear Mr. Lykken:

RE: 2011 Standard Natural Gas Inspection – Thurston/Lewis County. Docket PG-110042

PSE has received and reviewed your letter dated December 30, 2011 regarding the “2011 Standard Natural Gas Inspection – Thurston/Lewis County” and pursuant to your request is submitting the following written response, including actions taken to address the noted findings.

PROBABLE VIOLATIONS

1. **WAC 480-93-110 Corrosion control.**

(5) *Each gas pipeline company must conduct inspections or tests for electrical isolation between metallic pipeline casings and metallic pipelines at least once annually, but not to exceed fifteen months between inspections or tests. The test inspection must also determine whether the pipeline has adequate levels of cathodic protection at the casing to pipeline interface. These requirements do not apply to unprotected copper inserted in ferrous pipe.*

(b) *Whenever electrical isolation tests or inspections indicate that a possible shorted condition exists between a casing and a pipeline, the gas pipeline company must conduct a follow-up test within ninety days to determine whether an actual short exists. The gas pipeline company's procedures manual must have a level or threshold that would indicate a potential shorted condition and must also detail the method of determining whether the casing is actually shorted to the pipeline.*

Finding(s):

No follow-up testing performed within 90 days of identifying a possible shorted casing. This facility has been below the 100mV isolation criteria identified in 2600.1500 Section 5.3 of PSE's Gas Operating Standard for several years. This site does not meet the minimum isolation criteria specified in the manual. The operator was asked if prior to 2008 if there was a similar condition at this location. Upon further review, the casing in question had similar low readings in 2007 and 2006. 2006 is as far back as the records are maintained.

CAPITAL WAY & LEGION WAY	Olympia	G1	9/25/2008	4/23/2008	ISO PSP ON	1033.00
CAPITAL WAY & LEGION WAY	Olympia	G1	9/25/2008	4/23/2008	Iso mV delta on	6.00
CAPITAL WAY & LEGION WAY	Olympia	G1	9/25/2008	4/23/2008	PSP ON	1,039.00
CAPITAL WAY & LEGION WAY	Olympia	G1	7/23/2009	4/6/2009	ISO PSP ON	1,077.00
CAPITAL WAY & LEGION WAY	Olympia	G1	7/23/2009	4/6/2009	Iso mV delta on	5.00
CAPITAL WAY & LEGION WAY	Olympia	G1	7/23/2009	4/6/2009	PSP ON	1,072.00
CAPITAL WAY & LEGION WAY	Olympia	G1	7/6/2010	4/13/2010	ISO PSP ON	1,067.00
CAPITAL WAY & LEGION WAY	Olympia	G1	7/6/2010	4/13/2010	Iso mV delta on	6.00
CAPITAL WAY & LEGION WAY	Olympia	G1	7/6/2010	4/13/2010	PSP ON	1,061.00
CAPITAL WAY & LEGION WAY	Olympia	G1	7/13/2011	4/18/2011	ISO MV DELTA ON (NEG)	-2.00
CAPITAL WAY & LEGION WAY	Olympia	G1	7/13/2011	4/18/2011	ISO PSP ON (NEG)	-1,186.00

PSE response:

Subsequent to the inspection, PSE conducted further research of available records pertaining to this finding. The following documents were found and are enclosed with this letter for Staff's consideration:

- SAP "Data Sheet" providing test site information dating back to 2002.
- SAP "Display Notification: Gas Follow up" evidencing a follow-up to the initial report of the shorted casing.

Data contained in the documents show that the shorted casing was first identified on 5/10/2006 and a follow-up was completed on 6/20/2006 and within the required 90-days timeframe.

In the hope that these documents help eliminate the concern raised in this finding and demonstrate PSE's compliance with the referenced WAC requirement, PSE respectfully requests that this probable violation be removed.

2. WAC 480-93-110 Corrosion control.

- (5) *Each gas pipeline company must conduct inspections or tests for electrical isolation between metallic pipeline casings and metallic pipelines at least once annually, but not to exceed fifteen months between inspections or tests. The test or inspection must also determine whether the pipeline has adequate levels of cathodic protection at the*

casing to pipeline interface. These requirements do not apply to unprotected copper inserted in ferrous pipe.

(d) Whenever a short exists between a line pipe and casing, the gas pipeline company must perform a leak survey within ninety days of discovery and at least twice annually thereafter, but no to exceed seven and one-half months between leak surveys until the shorted condition is eliminated.

Finding(s):

No leak survey was performed within 90 days of the shorted casing identified in the preceding table being discovered. Additionally, the leak survey was not performed twice annually thereafter, not to exceed seven and one-half months between leak surveys, until the shorted condition is eliminated. There is no record that it was leak surveyed other than what is required under the standard survey program for business districts.

PSE response:

Following discovery of the shorted casing, PSE first leak surveyed the main between 8/17/2006 and 8/21/2006 as indicated in the enclosed report "Op Map 268014 2006 Leak survey". Subsequently and as stated in the finding PSE conducted annual surveys of the main. The most recent leak survey was conducted on 12/5/2011. All surveys detected no leaks at the shorted casing location.

In November 2011, this shorted casing location was added to the bi-annual survey database as shown in the enclosed document "Casing Survey DB". The target completion date for the next scheduled survey is 7/17/2012.

The process of adding and conducting a twice annually or not to exceed seven and one-half months leak surveys spans across several PSE departments. As a result of this inspection PSE held several discussions between stakeholders to evaluate this process. Areas of improvements were identified. PSE intends on documenting and implementing these improvements by February 28th, 2012.

In addition PSE is reviewing all other shorted casing to ensure they are being surveyed at appropriate frequency. This review is scheduled to be completed by February 28th, 2012.

PSE trusts that the information provided fully responds and satisfies your request. PSE respects the Commission's responsibilities in auditing and enforcing pipeline safety regulations and we continue our efforts to construct, operate and maintain a safe gas pipeline system that meets high standards of excellence.

Sincerely,



Sue McLain
Senior Vice-President Delivery Operations

Enclosure

Cc: Carol Wallace, Director Gas Operations

Cathy Koch, Director Compliance

Cheryl McGrath, Manager Compliance and Regulatory Audits- Gas



Data Sheet

History Range: to 01/26/2012

IC - Test Site ISO: TS-047585 - Test Site (Iso.) 47585 of IC-037003

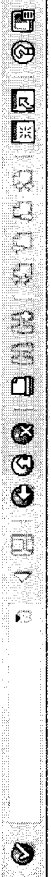
DESCRIPTION: 48' wcl of Capitol Way & 22' ncl on Legion Way
Special Instr: NW corner of intersection next to vent pipe
End Spec Inst

Current Status: **INST / CNST** Work Center: **PCCST01 - C.C.S. TECH 1 Scott Salazar (OLY)**
Street: **CAPITOL WAY & LEGION WAY** City: Olympia Plat: 269.016
Location X: 48 FT W of C/L CAPITOL WAY Location Y: 22 FT N of C/L LEGION WAY
TEST POINT LOCATION: Wire Box CRITICAL BOND INDICATOR: ?
ISOLATION FACILITY TYPE: Main ASSOCIATED REG STATION: ?
RETIRED DATE: ? Default Retired Date (Y/N): ?

Notification	Date	By	PSP on	PSP off	PSP Inst Off	ISO PSP on	ISO PSP off	ISO mV Delta On
F456416	11/05/2002	TLINVI	1420	940		620	620	
1004810	04/19/2003	FMILLE	980	730		590	590	390
1028166	04/22/2004	AJOHAN	1250	950		610	610	640
1055794	05/17/2005	AJOHAN	990	730		470	470	520
1081928	05/10/2006	JBILLI	920	700		920	700	
1138868	06/25/2007	AJOHAN	925	739		925	739	
1104176	08/10/2007	SSALAZ	980	776		971	767	11
1183209	04/23/2008	TLINVI	1039	801		1033	807	6
1237988	04/06/2009	MCUYLE	1072	835		1077	847	5
1277375	04/13/2010	SSALAZ	1061	848		1067	859	6

After 1/1/2011 PSP reads are recorded with normal negative values, before this PSP reads were recorded as positive values.

Notification	Date	By	PSP On (Neg)	PSP Inst Off (Neg)	PSP Depol (Neg)	100 mV Delta (Neg)	ISO PSP on (Neg)	ISO PSP Off (Neg)	ISO mV Delta On (Neg)
1363682	04/18/2011	MCUYLE	-1188	-918			-1186	-919	-2



Display PM Notification: Gas Follow Up*

Notification 1104175 62 IC-037003 - TS-047585 > FOLLOW UP
 Notific. Status ATCO NOCO NOPT FLC0

Maintenance plan Tasks

Responsibilities

Planner group G08 / 1000 GS Catholic Protec
 Main WorkCtr PCCSC002 / 1000 C.C.S. CREW 2 Mike Cuyte (OLY)
 Person Responsi
 Reported by JBILLI Notif date 05/11/2006 07:15:50

Start/End Dates

Required Start 05/10/2006 00:00:00 Priority
 Required End 06/06/2006 00:00:00 Breakdown

Reference object

Functional loc. IC-037003 NORTHWEST OLYMPIA RECTIFIER.
 Equipment

Item

Object part
 Damage
 Text
 Cause code
 Cause text
 Entry 0 Trm 0

Effect on the system

Funcd. loc. affected IC-037003 NORTHWEST OLYMPIA RECTIFL.
 Equipment affected
 Effect

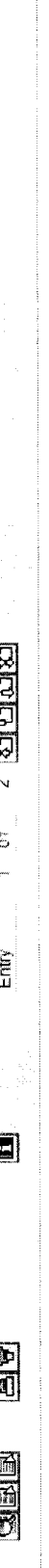


Display PM Notification: Gas Follow Up*



Notification: 1184175 62 IC-037003 > TS-047585 > FOLLOW UP
 Notification Status: ATCO NOCO NOPT FLCO
 Maintenance plan: Tasks

N.	Code gr.	Tas.	Task code text	Completion D.	Task text	Respon...	Status	User Sta...	Completed By	Ta...	Task processor	List name
1	1NGMINP	GFC	GAS FOLLOWUP DOWN COMPLIANCE	06/20/2006	Original 1081928	DM0FFE	TSCO	MCUYLE	MCUYLE	Person Respo...	Person Respo...	David S Moffett
2	1NGMINP	GFCR	GAS FOLLOWUP COMPLIANCE RESO.	06/20/2006	Original 1081928	DM0FFE	TSCO	MCUYLE	MCUYLE	Person Respo...	Person Respo...	David S Moffett



Op Map 268014 2006 Leak survey

@Change_Data2

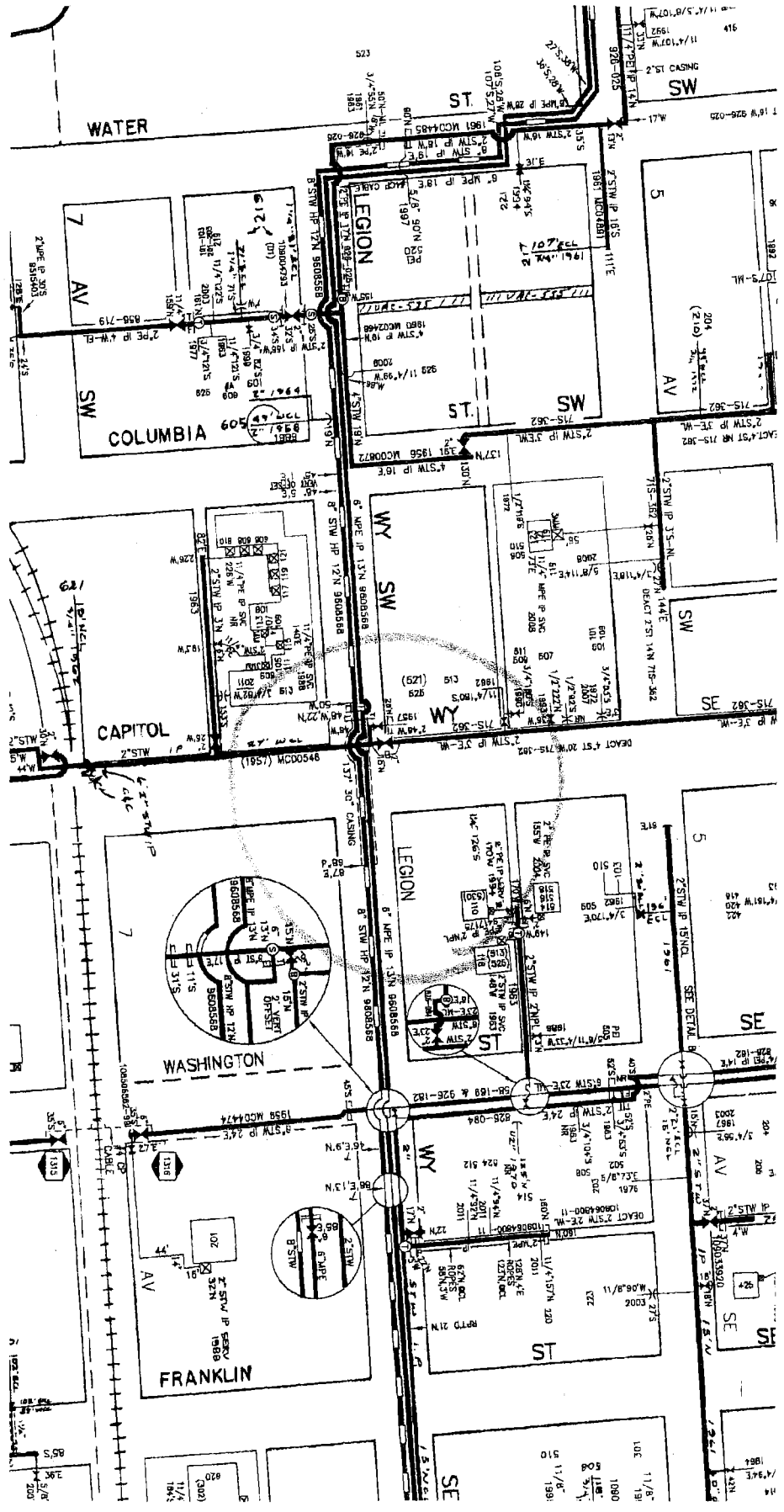
1/26/2012

Encl 4/6

Consultant	Op Map	PLAT Map	Survey	Facility Type	Date	Hours	Feet of Services	Re-Eval	New Leaks	Order #	Week
PIERCE	268014		FM	PRB	8/17/2006	6	49800	0	1	7059	46
PIERCE	268014		FM	PRB	8/18/2006	7.5	44400	0	0	7069	46
PIERCE	268014		FM	PRB	8/21/2006	2	10200	0	0	7069	47

ALL BUSINESS DISTRICT MAINS USERS MOBILE
LEAKAGE SURVEYED ON THIS OP MAP
BETWEEN 8/17/2006 - 8/21/2006

20016



End 5/6

CASING SURVEY D.B. 1/26/2012

OP #	PLAT #	TEST SITE	SOURCE	CITY	SURVEY DATES:		INVENTORY
<u>252050</u>							
	253055	NoT/S029	shorted casing	Lakewood	<u>target</u> 4/12/2012	<u>last</u> 8/31/2011	<input type="checkbox"/>
		108 ST SW & Pacific HWY S On 108 ST SW from 50' W CL of Pacific Hwy S to 50' E CL of Pacific Hwy S 8' Casing crossing Pacific Hwy S					
	254055	NoT/S034	shorted casing	Lakewood	4/13/2012	9/1/2011	<input type="checkbox"/>
		I-5 at 112 ST SW 66-234 HP main crossing I-5 at 112 ST SW in Lakewood There are three sections of HP main in casing crossing I-5. No locations platted.					
	255053	TS-064812	shorted casing	Lakewood			<input type="checkbox"/>
		I-5 at San Francisco Ave SW 25' ECL San Francisco Ave SW on Southbound and Northbound I-5 2" stw in 4" casing under I-5, shorted with low CP read					
<u>268014</u>							
	269016	047585	shorted casing	Olympia	<u>target</u> 7/17/2012	<u>last</u> 12/5/2011	<input type="checkbox"/>
		Legion Way SE & Capitol Way 50' WCL Capitol Way SE to 87' ECL Capitol Way SE and 12' NCL Legion Way SE Shorted casing per Dave Moffett 11/23/2011, 8" STW HP in 30" st casing					
<u>268026</u>							
	269026	NoTS094	non-bare steel c	Lacey Thurston	<u>target</u> 4/12/2012	<u>last</u> 8/31/2011	<input type="checkbox"/>
		Pacific Ave SE & Lake Lois St 17'N Pacific Ave SE, from 25'W CL to 25' W CL Lake Lois St SE 6" HP STW in 21' long 8" PVC Casing reported by Scott Salazar					
	269026	NoTS095	non-bare steel c	Lacey Thurston	4/12/2012	8/31/2011	<input type="checkbox"/>
		Pacific Ave SE & Kinwood St 24' N CL Pacific Ave SE from 40' W CL to 40' E CL Kinwood St SE 6" STW HP in 75' long 8" PVC casing					
<u>320008</u>							
	323011	NoT/S102	non-bare steel c	Chehalis	<u>target</u> 7/17/2012	<u>last</u> 12/5/2011	<input type="checkbox"/>
		SW 11 St & SW William Ave 17'W, 18'N as platted Survey Main in 16" Terra Cotta casing in SW 11 St running Southwesterly from SW W					

Total Number of Sites: 52