

## NW Natural's Follow-up Comments

### Chapter 480-93 WAC, Docket No. UG-011073

Note: The change bars on the right side of the text indicates NW Natural's input following the workshop held February 25, 2003.

#### **WAC 480-93-005 Definitions.**

(3/14/03) NWN suggests the following definition for "Business District":

**Business District – An area where commercial businesses are prevalent and hard surface extends from building wall to building wall.**

#### **WAC 480-93-017 Filing requirements for design, specification, and construction procedures. (Design and Construction)**

- (1) Any gas company operating a gas pipeline facility in this state must have on file with the Commission all applicable design, specification and construction procedures used for each pipeline facility. All procedures must detail the acceptable types of materials, fittings and components for the different types of facilities in the gas company's system.
- (2) Any construction plans which that do not conform with a gas company's existing and accepted design, specification, and construction procedures on file with the commission, must be submitted to the commission at least forty-five days prior to the initiation of construction activity. Written commission approval or rejection of the design, specification, and construction procedures to be utilized will be made within forty-five days of receipt of all documentation necessary to evaluate the proposed construction activity.

(3/14/03) NWN suggests adding the following exception:

**Construction performed in response to an emergency situation is exempt from the provisions of this section.**

#### **WAC 480-93-018 Maps, drawings, and records of gas facilities. (O&M)**

- (1) Each gas company must prepare, maintain, and make available to the commission or its designated representatives all maps, drawings, and records of the company's gas pipeline facilities. The maps, drawings, and records must show the size and type of material for all facilities, corrosion control systems, and

the maximum allowable operating pressures. The maps and drawings must indicate the location of all district regulators, **and** gate stations, and **location of all valves, identifying the** emergency valves specified in the company's emergency plan.

(2) Each gas company must make books, records, reports, and other information available to the commission, so the commission or its authorized representatives can determine whether the gas company is in compliance with state and federal regulations.

~~(3) All construction records, revisions to maps, and operating history made available to appropriate operations personnel must be **updated** reviewed for accuracy and, if necessary, **updated at least** every six months.~~

(3/14/03) NWN suggests replacing paragraph (3) with the following:

**Records of construction activity and operating history must be updated within 6 months of completion of the activity and made available to appropriate operations personnel.**

**WAC 480-93-080 Welder **and joiner** identification and qualification certificates. (O&M)**

(1) All welding procedures and welders must be qualified to API Standard 1104 (18<sup>th</sup> edition) or section IX of the ASME Boiler and Pressure Vessel Code (1995 edition). Each welder qualification test result must be recorded and kept for a period of 5 years.

NWN original comment (2/14/03):

**Appendix C to Part 192, Qualification of Welders for Low Stress Level Pipe, should be added to the list of approved welder qualifications since it is an acceptable procedure under the federal pipeline safety code.**

**All welding procedures and welders must be qualified to API Standard 1104 (18<sup>th</sup> edition most current edition listed in 49 CFR, Part 192, Appendix A), 49 CFR, Part 192, Appendix C, or section IX of the ASME Boiler and Pressure Vessel Code (1995 edition most current edition listed in 49 CFR, Part 192, Appendix A).**

(3/14/03) NW Natural suggests adding the following sentence:

**Oxyacetylene welders who qualify under 49 CFR Part 192 Appendix C, may only perform fillet and butt welds on nominal 2-inch or smaller diameter pipe.**

Each welder qualification test result must be recorded and kept for a period of 5 years.

**WAC 480-93-yyy Protection of Plastic Pipe. (New Rule) (Design and Construction)**

- (2) When installing plastic pipelines parallel to other underground utilities, a minimum of 12 inches of separation from the other utilities must be maintained, **if possible**. Where a minimum 12 inches of separation is not possible, adequate precautions must be taken to minimize any potential hazards resulting from the close proximity to the other utilities.
- (3) When installing plastic pipelines perpendicular to other underground utilities, a minimum of 6 inches of separation from the other utilities must be maintained, **if possible**. Where a minimum 6 inches of separation is not possible adequate precautions must be taken to minimize any potential hazards resulting from the close proximity to the other utilities.
- (4) **Except as explicitly provided in this section,** plastic pipe must not be installed above ground. Where necessary to prevent customer outage and no other alternative exists, plastic pipe may be temporarily installed above ground **for the length of time required to complete the permanent installation.**  
(3/14/03) NW Natural suggests adding the following sentence: **During the temporary installation, measures must be taken to protect the plastic pipe from damage.**
- (5) Plastic pipe must not be backfilled or bedded with any rock, ~~or~~ debris larger than one-half inch in diameter, **or any materials** that could potentially cause damage **to the pipe**. All efforts must be taken to provide a rock free bedding material for plastic pipe.
- (6) Plastic pipe must not be squeezed more than one time in the same location.
- (7) **Plastic pipe must not be squeezed within 12 inches or 3 pipe diameters from any joint, whichever is greater.**
- (8) Plastic pipe must be installed and backfilled, **if possible** (NWN comment added 3/14/03), prior to being pressure tested to expose any potential damage that could have occurred during the installation and backfilling process.

(3/14/03) NWN comment:

**Suggest that emergency repairs and replacements due to damages are exempt from this provision.**

**WAC 480-93-185 Failure investigation. (O&M)**

- (1) Each gas company must promptly investigate any notification of a leak, explosion, or fire, which may involve gas pipelines or other gas facilities,

received from any outside source such as a police or fire department, other utility, contractor, customer, or the general public. In the event of an explosion, fire, death, or injury, the gas company may remove any suspected gas facility. Once the situation is made safe, the facility must remain intact until directed by the lead investigative authority. Where the investigation reveals a leak, the leak must be graded in accordance with ~~to~~ WAC 480-93-186, and appropriate action must be taken in accordance with the rule. ~~Grade 1 or Grade 2 leaks may not be downgraded to a Grade 3 leak without a physical repair having been made to the pipeline facility.~~

(3/14/03) NWN recommends replacing the last sentence in the above paragraph with the following:

**When a follow-up inspection is performed before a leak is repaired, each previously identified leak must be evaluated and classified based on a review of current conditions in accordance with WAC 480-93-186. Leaks may be upgraded or downgraded based on conditions at the time of reassessment.**

NWN original comments:

**The above statement designating authority to the WUTC is contradictory to federal regulation. 49 CFR 192.617 states:**

**"Each operator shall establish procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of recurrence."**

**This definition of jurisdiction may prevent the operator from complying with the requirements of §192.617.**

**There is also a legal concern regarding preservation of evidence at the site until the Commission authorizes the release of the gas facility for failure analysis.**

**The leak grading requirement should be addressed in WAC 480-93-186. However, we suggest this language be struck out. Under some circumstances, improved or additional information will legitimately support changing a Grade 1 or 2 leak to a Grade 3 leak without a physical repair having been made to the pipeline facility.**