



**Georgia-Pacific**

**CONSUMER PRODUCTS (CAMAS) LLC**

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January 27, 2012

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

**RE: Docket No. -PG-110017**

Dear Director Lykken:

Enclosed with this letter please find a number of documents addressing any remaining issues identified by the Washington Utilities and Transportation Commission (UTC or Commission) in a notice of probable violation issued to GP's Camas Mill on September 20, 2011. Our initial response was submitted on October 21, 2011, and that submittal anticipated follow-up materials by the end of January 2012. At the request of the Commission, we made an early submittal of specifically requested information on January 18, 2012; this package should address all outstanding issues. The January 18 response is incorporated by reference herein and is Attachment 10.

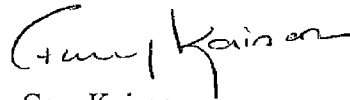
As you know, this matter concerns a 1.7 mile long natural gas pipeline that serves the GP Camas Mill. That line was constructed in 1992 - 1993, and is operated at low pressure (the line as constructed is capable of operating at a maximum allowable operating pressure (MAOP) of 800 psig, but as used -- and per agreement with the UTC -- it is in fact operated at a maximum operating pressure of only 250 psig).

We appreciate the Commission's cooperation in helping us address and resolve any issues raised in last September's notice. We take our obligations to the public, the State and our customers very seriously, and we believe the various submittals that we have made in response to the notice demonstrate our commitment to pipeline safety. GP is continuing the comprehensive review, and if necessary, revision of our O&M Manual as stated in our October 21 response. Once GP is satisfied it is in final form, the Manual will be submitted to the UTC.

STATE OF WASHINGTON  
UTILITY AND TRANSPORTATION COMMISSION  
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RECORD  
REGIONS WASHINGTON

We hope this matter can be considered concluded upon your review of these materials. If you have any questions, however, please do not hesitate to contact me or Steve Ringquist at our facility. Of course, we remain open to a meeting should that be requested.

Thank you.

A handwritten signature in black ink that reads "Gary Kaiser". The signature is written in a cursive style with a large initial "G" and "K".

Gary Kaiser  
Vice President

Pursuant to WAC 480-07-160, attachment 10 is designated as confidential to protect individual privacy.

P.S. As with all prior submittals, please note that GP considers all of this material confidential business information (CBI), pursuant to 49 C.F.R Part 7.13(c)(4) and Part 7.17, and all other applicable federal and State law.

GKW/jm

Enclosures

cc: Steve Ringquist - GP/Camas  
Ron Simmons - GP/Atlanta  
Thomas O'Connor, Esq.  
Robert Hogfoss, Esq.  
Craig Trummel, Esq.

**Georgia Pacific - Camas Facility**  
**July 2011 Natural Gas Pipeline Safety Inspection**  
**WACU Docket PG-110017**

The Following is Georgia Pacific's response or action on those items identified for further action in its October 21, 2011 letter to the WUTC.

**1. WAC 480-93-015 Odorization of gas.**

*GP failed to provide annual calibration records for their Heath Odorator for 2009.*

Response:

- WTUC accepts GP October 21, 2011 response, per January 3, 2012 phone conversation
- The monthly bump check (periodic check) will be documented using the form in the manual.
- Annual calibration date changed to January.

**2. WAC 480-93-017 Filing requirements for design, specification, and construction procedures.**

*Requires a minimum fitting grade specification of Y-52 fittings. GP's design and construction records both specify Y-42 fittings.*

Response:

- GP provided a supplemental response to this item in our January 18, 2012 letter, and it is incorporated herein

**3.1 WAC 480-93-018 Records.**

*GP failed to provide records which demonstrate their pipeline contractor employees from Alaska Continental Pipeline Company complied with the operator qualifications.*

Response:

- GP provided a supplemental response to this item in our January 18, 2012 letter, and is incorporated herein.
- GP has added a summary of qualification requirements for pipeline contractors to the O&M manual in Section 3.9. See Attachment 1.
- GP will implement the use of a Pipeline Maintenance Construction Checklist. See attachment 4.

- GP will train employees responsible for hiring pipeline contractors on the procedures to obtain, review, approve and retain operator qualification records for contractors.

**3.2 WAC 480-93-018 Records.**

*GP failed to maintain records which identify their non-destructive testing contractor employees from Oregon Washington Laboratories.*

Response:

- GP has added a summary of qualification requirements for pipeline contractors to the O&M manual in Section 3.9. See Attachment 1.
- GP will implement the use of a Pipeline Maintenance Construction Checklist. See attachment 4.
- GP will train employees responsible for hiring pipeline contractors on the procedures to obtain, review, approve and retain operator qualification records for contractors.
- This item is related to item 25.2

**3.3 WAC 480-93-018 Records.**

*GP failed to provide accurate construction records detailing the line pipe ordered and used for the construction of SR-14 transmission line project in 2010.*

Response:

- GP provided a supplemental response to this item in our January 18, 2012 letter.

**3.4 WAC 480-93-018 Records.**

*GP failed to provide records showing that they jeoped their SR-14 transmission line project.*

Response:

- The WUTC accepted GP's October 21, 2011 response per January 4, 2012 phone conversation the WUTC accepted that amended OQ-004 addresses this concern.
- GP has verified that the voltage parameters in our procedure are appropriate for our coating material and thickness. GP has also updated the procedure to list voltage recommendations for various coatings.

**3.5 WAC 480-93-018 Records.**

*GP failed to provide staff with a copy of their annual report.*

Response:

- WTUC accepts GP October 21, 2011 response. Per January 3, 2012 phone conversation the WUTC accepted that GP had submitted annual reports on schedule.

**3.6 WAC 480-93-018 Records.**

*GP failed to keep accurate design, construction, and/or installation records for their SR-14 pipeline project.*

Response:

- GP submits Attachment 2 showing the history of revisions to the SR-14 project design document.
- GP submits calculations proving the maximum SMYS attained during hydrostatic pressure testing for the SR-14 project was 45.9%. See Attachment 3.
- GP has amended O&M manual section 4.8 Pressure Testing to specify safety requirements for testing at or above 50% SMYS.

**3.7 WAC 480-93-018 Records.**

*GP failed to provide records identifying their contact and liaison program information with public officials.*

Response:

- GP will update our O&M manual section 3.7 procedures to identify where the filing location of public liaison list filed and how this list is maintained.
- GP has attached the listing of Public Officials. See Attachment 8.
- This item is related to item 22.

**3.8 WAC 480-93-018 Records**

*GP failed to provide records which evidence the content and delivery of their Public Awareness stakeholder messages.*

Response:

- GP's public awareness program is maintained outside of our O&M manual. The following statement has been added to our O&M Manual in section 3.7:

*GP has established a continuing public education program to raise awareness, promote pipeline safety and damage prevention to the affected public, appropriate government organizations, and persons engaged in excavation related activities. The Public Awareness Program procedures are available in the GEORGIA PACIFIC CAMAS MILL NATURAL GAS TRANSMISSION PIPEPELINEPIPELINE PUBLIC AWARENESS PLAN on file in the pipelines files.*

- GP will implement the use of a "Public Awareness Communication" form to document and record activities. See attachment 5.

**3.9 WAC 480-93-018 Records.**

*GP failed to update their maps within 6 months of when it completed any construction activity.*

Response:

- GP has updated pipeline maps and is currently updating construction drawings.
- GP will provide training to effected employees to follow procedures to update documentation.

**3.10 WAC 480-93-018 Records.**

*GP failed to record their Odorator calibration and periodic test.*

Response:

- Corrective Action accepted by WUTC per phone conversation
- The monthly bump check (periodic check) will be documented using the form in the manual.
- Annual calibration date changed to January.

**3.11 WAC 480-93-018 Records.**

*GP failed to maintain their valve inspection records for 2008, 2009, 2010 and 2011.*

Response:

- GP has provided corrective training to use the form in the GP manual.

- GP will continue to provide training to employees and contractors to use the proper O&M manual forms.
- See attachment 6 for an example of new practices implemented post audit.
- This item is related to item 7.14.

**4.1 WAC 480-93-110 Corrosion Control.**

*GP failed to provide recalibration records for their multi-meters for the calendar years 2009, 2010, and 2011.*

Response:

- GP will maintain these records, not the inspection contractor.
- GP will require proof of calibration be included with each cathodic protection report.

**4.2 WAC 480-93-110 Corrosion Control.**

*GP failed to provide accuracy check records for their copper/copper sulfate half-cells for the calendar years 2009, 2010, and 2011.*

Response:

- Per January 3, 2012 phone conversation, the WUTC accepted GP's O&M manual update which states that half-cells will be replaced annually.

**5. WAC 480-93-110 Corrosion Control.**

*Since 1993, GP has failed to inspect and/or monitor for atmospheric corrosion beneath 4 metallic pipe supports.*

- All four supports were inspected in 2011.
- O&M Manual section 3.3 Corrosion Control has been reviewed. GP determined that all necessary information was contained within the procedures and the procedures were updated for clarity during this review.
- GP has updated O&M manual procedure 3.3.6.4 to require discrete measurements be recorded when measuring pipe wall loss due to corrosion.
- GP will implement an "Atmospheric Corrosion Inspection" form to record atmospheric corrosion monitoring and inspection activities. See attachment 7.

**6 WAC 480-93-160 Reporting requirements of proposed construction.**

*GP failed to file their proposed construction report with the commission at least forty-five days prior to the replacement of their transmission pipeline running parallel to SR-14.*

Response:

- GP will provide training to follow procedure 4.17 in our O&M Manual which specifies WUTC notification requirements prior to construction activities.

**7.1 WAC 480-93-180 Plans and procedures.**

*GP failed to record details of their leaks and leak investigations for 2008, 2009, and 2010.*

Response:

- GP will train leak responders to follow procedures and document activities on the "Leak Survey" form.
- GP will re-qualify leak responders in 2012.

**7.2 WAC 480-93-180 Plans and procedures.**

*GP failed to follow their Alcohol Misuse Prevention Plan (AMPP) procedures under XIV(D)(1) Contractor Monitoring - Qualifying Potential Contractor(s).*

- GP provided a supplemental response to this item in our January 18, 2012 letter.
- GP has added a summary of qualification requirements for pipeline contractors to the O&M manual in Section 3.9. See Attachment 1.
- GP will implement the use of a Pipeline Maintenance Construction Checklist. See attachment 4.
- GP will train employees responsible for hiring pipeline contractors to follow contractor qualification procedures.

**7.3 WAC 480-93-180 Plans and procedures.**

*GP failed to follow their Alcohol Misuse Prevention Plan (AMPP) procedures under XIV(D)(2) Contractor Monitoring - Monitoring Contractor's Compliance.*

Response:

- GP has added a summary of qualification requirements for pipeline contractors to the O&M manual in Section 3.9. See Attachment 1.
- GP will implement the use of a Pipeline Maintenance Construction Checklist. See attachment 4.



- GP will train employees responsible for hiring pipeline contractors to follow contractor qualification procedures.

**7.4 WAC 480-93-180 Plans and procedures.**

*GP failed to follow their Alcohol Misuse Prevention Plan (AMPP) procedures under XIV(D)(4) Contractor Monitoring - Statistical Record Retention.*

- The GP Alcohol Plan requirements specify the procedure to be followed.
- GP has added a summary of qualification requirements for pipeline contractors to the O&M manual in Section 3.9. See Attachment 1.
- GP will implement the use of a Pipeline Maintenance Construction Checklist. See attachment 4.
- GP will train employees responsible for hiring pipeline contractors to follow contractor qualification procedures.

**7.5 WAC 480-93-180 Plans and procedures.**

*GP failed to update their O&M manual with the correct API 1104 reference.*

Response:

- GP will prevent re-occurrence with O&M manual procedure 3.8.23 for annual procedure review.
- This response was accepted during January 3, 2012 phone call with the WUTC.

**7.6 WAC 480-93-180 Plans and procedures.**

*GP failed to follow their procedures in Section 4.6 Materials which requires a minimum fitting grade specification Y-52.*

Response:

- GP O&M manual has been updated as per our response to the WUTC on October 21, 2011.
- GP has submitted documentation establishing the traceability of the materials ordered by GP for the SR-14 project to the actual material delivered. This documentation was provided in our January 18, 2012 supplemental response, items 2 and 3.3.

**7.7 WAC 480-93-180 Plans and procedures.**

*GP failed to follow their procedures regarding contractor requirements for Permanent Repairs in Section 4.*

Response:

- GP has added a summary of qualification requirements for pipeline contractors to the O&M manual in Section 3.9. See Attachment 1.
- GP will implement the use of a Pipeline Maintenance Construction Checklist. See attachment 4.
- GP will train employees responsible for hiring pipeline contractors on the procedures to review, approve and retain operator qualification records for contractors.

**7.8 WAC 480-93-180 Plans and procedures.**

*GP failed to follow their Section 11.0 Radiographic Procedures Details dated 04.09.09.*

Response:

- GP will provide training to follow NDT testing procedures.

**7.9 WAC 480-93-180 Plans and procedures.**

*GP failed to update their procedures with the correct API Standard 1104, "Welding of Pipelines and Related Facilities."*

Response:

- This was acknowledged as duplicate to 7.5, per phone conference January 3, 2012 by WUTC.

**7.10 WAC 480-93-180 Plans and procedures.**

*GP failed to follow their procedure Section 4.16 by not filing a proposed construction report with the commission at least forty-five days prior.*

Response:

- GP will provide training to follow procedure 4.17 in our O&M Manual which specifies WUTC notification requirements prior to construction activities.

**7.11 WAC 480-93-180 Plans and procedures.**

*GP did not file procedural manual revisions with the commission annually.*

Response:

- WTUC accepts GP will prevent re-occurrence with O&M manual procedure 3.8.23 for annual procedure review.

- The October 21, 2011 response was accepted during January 3, 2012 phone call with the WUTC.
- This item is related to item 7.5.

**7.12 WAC 480-93-180 Plans and procedures.**

*GP failed to record their Odorator periodic test records every 30 days and annually.*

Response:

- GP has retrained the inspection contractor to properly document monthly checks by using the form in the O&M manual.
- This item is related to item 1.

**7.13 WAC 480-93-180 Plans and procedures.**

*GP failed to follow their procedure OQ-006 for patrolling.*

Response:

- GP will require the inspection contractor to properly use the form.
- GP will continue to provide training to employees and contractors to follow procedures.
- This item is related to item 1.

**7.14 WAC 480-93-180 Plans and procedures.**

*GP failed to use the Valve Inspection and Repair Form required.*

Response:

- GP provided corrective training to use the form in the GP manual.
- GP will continue to provide training to employees and contractors to use the proper O&M manual forms.
- See attachment 6 for an example of new practices implemented post audit.
- This item is related to item 3.11.

**7.15 WAC 480-93-180 Plans and procedures.**

*GP failed to follow PA Program Procedure 10.0 Program Documentation and Record Keeping.*

Response:

- GP will update our Public Awareness Plan section 10 to require the use of a “Public Awareness Communication” form to maintain a log of the program implementation activities. See attachment 5.
- GP has incorporated a reference to the Public Awareness Plan in our O&M Manual in section 3.7. See our response to item 3.8 for additional details of this.

**7.16 WAC 480-93-180 Plans and procedures.**

*GP failed to follow PA Program Procedure 11.0 Program Evaluation.*

Response:

- GP will update our Public Awareness Plan section 11.0 with the additional requirement to evaluate if there has there been a statistical decline in damage incidents/near misses and/or an increase in the use of One-Call systems
- In addition GP will begin use of the “Public Awareness Communication” form to monitor and track program activity. See attachment 5.

**8.1 WAC 480-93-180 Plans and procedures.**

*GP's procedures failed to detail step-by-step instructions and/or to reference the manufacturer's procedures for the installation of Plidco fittings/clamps.*

Response:

- WTUC accepts GP October 21, 2011 response. Per January 4, 2012 phone conversation the WUTC accepted that amended OQ-007 addresses this concern.

**8.2 WAC 480-93-180 Plans and procedures.**

*GP does not have a procedure for jeeping, calibration of the jeeping equipment.*

Response:

- WTUC accepts GP October 21, 2011 response. Per January 4, 2012 phone conversation, the WUTC accepted that amended OQ-004 addresses this concern.
- GP has verified that the voltage parameters in our procedure GP will ensure maximum amperage limits are appropriate for our coating material and thickness. GP has also updated the procedure to list voltage recommendations for various coatings.

**8.3 WAC 480-93-180 Plans and procedures.**

*GP does not have a procedure for the review and acceptance criteria of hydrostatic tests.*

Response:

- WTUC accepts GP October 21, 2011 response. Per January 4, 2012 phone conversation, the WUTC accepted GP's updates to the hydrostatic pressure test acceptance procedure made to O&M manual.
- This item is related to 27.4.

**8.4 WAC 480-93-180 Plans and procedures.**

*GP does not have a procedure establishing minimum cover requirements.*

Response:

- WTUC accepts GP October 21, 2011 response. Per January 4, 2012 phone conversation, the WUTC accepted GP's updates for depth of cover requirements made to O&M manual.

**8.5 WAC 480-93-180 Plans and procedures.**

*GP does not have a procedure identifying the pressure testing equipment they use and the calibration frequency requirements for that equipment.*

Response:

- GP has reviewed and updated O&M procedure 4.8 (8) to require annual calibration or accuracy checks for pressure testing equipment in absence of OEM requirements.
- GP has verified that O&M procedure 4.8 (8) specifies testing equipment is to be tagged with the calibration expiration date.

**8.6 WAC 480-93-180 Plans and procedures.**

*GP's procedural manual fails to identify which records they will retain for the purposes of proving their compliance with their Damage Prevention Program.*

Response:

- GP has updated O&M manual section 3.7 to specify that damage prevention recordkeeping will be performed in accordance with Public Awareness Program section 11.0.
- GP will implement a new "Public Awareness Communication" form to document activities. See attachment 5.
- We are resubmitting our current list of excavators. See attachment 9.
- This item is related to item 3.7

**8.7 WAC 480-93-180 Plans and procedures.**

*GP's procedures fail to include sufficient detail required for administering, contacting and completing their liaison program with public officials.*

Response:

- GP has updated O&M manual section 3.7 procedures to identify where the public liaison list filed and how this list is maintained.
- GP has attached the listing of Public Officials. See Attachment 8.
- GP references and incorporates our response to item 3.7 for this item.

**8.8 WAC 480-93-180 Plans and procedures.**

*GP's procedures do not identify recalibration intervals/requirements for their odorant testing equipment.*

Response:

- GP has updated O&M manual procedure 3.1.2 to address requirements.
- GP has retrained the inspection contractor to properly document monthly checks by using the form in the O&M manual.
- This item is related to item 1.

**8.9 WAC 480-93-180 Plans and procedures.**

*GP does not have a procedure to ensure the replacement of damaged or missing pipeline markers occurs within 45 days from the date of notification.*

Response:

- WTUC accepts GP October 21, 2011 response. Per January 4, 2012 phone conversation, the WUTC accepted GP's O&M manual updates that specify procedures to repair pipeline markers within 45 days.

**8.10 WAC 480-93-180 Plans and procedures.**

*GP does not have a procedure for checking the accuracy and calibration of their half-cells.*

Response:

- WTUC accepts GP October 21, 2011 response. Per January 4, 2012 phone conversation, the WUTC accepted GP's O&M manual update mandating replacement of half-cells annually.
- This item is related to item 4.2.

**8.11 WAC 480-93-180 Plans and procedures.**

*GP's atmospheric corrosion control procedures.*

Response:

- O&M Manual section 3.3 Corrosion Control has been reviewed. GP determined that all necessary information was contained within the procedures the procedures were updated for clarity.
- GP will implement the use of the "Atmospheric Corrosion Inspection" form to document and record this inspection activity. See attachment 7.
- This item is related to item 5.

**8.12 WAC 480-93-180 Plans and procedures.**

*GP procedures Section 3.3.7 failed to include sufficient detail and clear and concise direction required for conducting remediation of atmospheric corrosion control.*

Response:

- O&M Manual section 3.3 Corrosion Control has been reviewed. While all the necessary information was contained within, the procedures were updated for clarity.
- GP will implement the use of the "Atmospheric Corrosion Inspection" form to document and record this inspection activity. See attachment 7.
- O&M manual section 3.3.7 is not the relevant reference. O&M manual section 3.3.9 addresses remediation of atmospheric corrosion.

**8.13 WAC 480-93-180 Plans and procedures.**

*GP failed to correct their IMP procedures.*

Response:

- GP has updated our Integrity Management Program plan with regard to the status of the Williams Pipeline remote control shut-off valve.
- The MOC for this change was approved on January 25, 2012 and the IMP plan was updated on the same date.
- This item is related to item 27.4

**9. WAC 480-93-185 Gas leak investigation.**

*GP failed to retain leak investigation records (for the life of the pipeline) for foreign leaks and the detail necessary to verify that gas detected during their annual leak surveys.*

Response:

- GP has determined the source of the gas detected during scheduled leak surveys on conducted on the dates October 25, 2008, September 19,2009 and October 16, 2010 was from a foreign source (landfill) and is non-hazardous. WUTC accepts this determination.
- GP will train leak responders to follow procedures and document activities on the “Leak Survey” form.
- GP will re-qualify leak responders in 2012.

**10. WAC 480-93-186 Leak evaluation.**

*GP failed to use a CGI for leaks discovered during their annual leak surveys.*

Response:

- A CGI device was used to investigate leaks discovered during annual leak surveys as per the requirement of OQ Procedure OQ-009 “Leak Investigation”.
- GP will train MERT team members that all CGI leak investigations findings will be documented regardless of results.
- GP has updated the O&M manual to require that a CGI device “must” be used.

**11. WAC 480-93-187 Gas leak records.**

*GP failed to record the magnitude and/or location of CGI reads taken during leak investigations.*

Response:

- GP will train MERT team members that CGI investigations will be documented regardless of results.

**12. WAC 480-93-188 Gas leak surveys.**

*GP's leak survey records failed to include maps for the following annual leak survey inspections.*

Response:

- The inspection contractor has been trained to follow procedure requiring use of map.



- Use of map implemented on the November 5, 2011 leak survey.

**13. WAC 480-93-188 Gas leak surveys.**

*GP failed to perform effective self-audits ensuring their records were accurate and complete.*

Response:

- WTUC accepts GP October 21, 2011 response. Per January 4, 2012 phone conversation, the WUTC accepted GP's O&M manual procedure 3.2.4 addresses this requirement.
- The Reliability Leader will track this procedure per O&M Manual procedure 3.5.

**14. 49 CFR §192.105 Design formula for steel pipe.**

*GP failed to complete their design calculations in accordance with this regulation.*

Response:

- GP submits Attachment 2 showing the history of revisions to the SR1-4 project design document.
- GP submits calculations that show the maximum SYMS attained during hydrostatic pressure testing for the SR-14 project was 45.9%. See Attachment 3.
- This item is related to item 3.6.

**15.1 49 CFR §192.225 Welding Procedures.**

*GP failed to qualify their welding procedures in accordance with CFR §192.225.*

Response:

- Weld procedure GP CAMAS-01 specifies all essential variables per the API 1104 standard.
- The procedure GP CAMAS-01 has been added to our O&M manual as a qualified procedure.

**15.2 49 CFR §192.225 Welding Procedures.**

*GP construction documents contain a welding procedure WPS GP CAMAS-01 dated 09.19.02.*

Response:

- GP has added weld procedure GP CAMAS-01 to the O & M Manual.
- GP natural gas weld procedure JR-SM-P1G has been amended (Rev. 2, January 13, 2012) to show Georgia Pacific name in place of James River Corporation

**16.a** 49 CFR §192.227 Qualification of Welders

*GP failed to complete the welder qualification process for this welder.*

Response:

- WTUC accepts GP October 21, 2011 response that the welder P.H. qualified using destructive testing methods on 4-9-2010 was determined acceptable by the WUTC as indicated during phone conference January 4, 2012.

**16.b** 49 CFR §192.227 Qualification of Welders

*GP failed to identify a qualified procedure used.*

Response:

- API 1104 standard does not require that a procedure number be specified on the welder's qualification report.
- GP has secured from R.L.D. a revised Arc Weld Test report for welder P.H., indicating the qualified procedure P.H. tested to.

**16.c** 49 CFR §192.227 Qualification of Welders

*GP failed to include face/root bend and nick break test details.*

Response:

- The welder with initials P.H. qualified on 4-9-2010 using destructive testing methods. The results of the face and root bend, and nick break tests were documented on the welder's test report date the same day.
- GP has added the procedure GP CAMAS-01 to our O&M manual as a qualified procedure.

**16.d** 49 CFR §192.227 Qualification of Welders

*GP failed to include essential variables.*

Response:

- Weld procedure GP CAMAS-01 specifies all essential variables per the API 1104 standard.
- The procedure GP CAMAS-01 has been added to our O&M manual as a qualified procedure.

**17. 49 CFR §192.241 Inspection and test of welds.**

*GP failed to provide records evidencing that the following people completing visual inspection of welding.*

Response:

- WUTC accepts GP October 21, 2011 response regarding R.L.D. qualifications to perform visual weld inspection. Accepted per phone conference January 4, 2012.

**18. 49 CFR §192.515 Environmental protection and safety requirements.**

*GP construction documents do not indicate that additional steps were taken to protect its employees and the general public in the testing area until the pressure was reduced.*

Response:

- GP submits Attachment 2 showing the history of revisions to the SR-14 project design document.
- GP submits calculations that show the maximum SYMS attained during hydrostatic pressure testing for the SR-14 project was 45.9%. See Attachment 3.
- GP has amended O&M manual section 4.8 Pressure Testing to specify safety requirements for testing at or above 50% SMYS.
- This item is related to item 3.6.

**19. 49 CFR §192.605 Procedural manual for operations, maintenance, and emergencies.**

*GP exceeded the review and update frequency interval for their manuals.*

Response:

- GP has updated procedure 3.8.23 to specify the review and update requirements for the O&M manual.
- GP has changed its annual O&M Manual review to the month of December.
- WUTC requested reference to Item 7.11 in this response.

**20. 49 CFR §192.614 Damage prevention program.**

*GP's Natural Gas Pipeline Maintenance, Operations, and Procedures Manual Damage Prevention Section 3.7 failed to identify a current list of excavators.*

Response:

- GP has updated the O&M Manual procedure 3.7.1 to specify that the list of excavators is filed and maintained in Appendix II of the Public Awareness Program pipeline files. See Attachment 9.
- This item is related to items 3.7, 8.6 and 21.

**21. 49 CFR §192.614 Damage prevention program.**

*GP's Natural Gas Pipeline Maintenance, Operations, and Procedures Manual under Section 3.7 Damage Prevention failed to identify the public located in the vicinity of the pipeline.*

Response:

- GP has updated the O&M manual section 3.7 to identify the “public located in the vicinity of the pipeline”.
- This item is related to items 3.7, 8.6 and 20.

**22. 49 CFR §192.615 Emergency plans.**

*GP failed to identify those public officials that it liaisons with and the liaison frequency.*

Response:

- GP has updated O&M manual section 3.7 procedures to identify where the public liaison list filed and how this list is maintained.
- GP has attached the listing of Public Officials. See Attachment 8.

**23.1 49 CFR §192.616 Public Awareness.**

*GP failed to implement and deliver their baseline message information in accordance with their written program...*

Response:

- GP references and incorporates its response to item 3.8 and 7.15
- GP delivered our message using a combination of mailings and face to face contacts.
- GP will implement the use of a “Public Awareness Communication” form to document and record activities. See attachment 5.

**23.2 49 CFR §192.616 Public Awareness.**

*GP failed to provide records that show the completion of their Public Awareness Program Evaluation occurred on or prior to June 20, 2010.*

Response:

- GP references and incorporates its response to item 3.8 and 7.15
- GP delivered our message using a combination of mailings and face to face contacts.
- GP will implement the use of a “Public Awareness Communication” form to document and record activities. See attachment 5.

**23.3 49 CFR §192.616 Public Awareness.**

*GP failed to provide records or documentation to support their PA program effectiveness conclusions.*

Response:

- GP delivered our message using a combination of mailings and face to face contacts.
- GP will implement the use of a “Public Awareness Communication” form to document and record activities. See attachment 5.
- This item is related to item 3.8 and 7.16.

**24. 49 CFR §192.805 Qualification program.**

*GP failed to provide documentation to show that they had completed an evaluation process to qualify and/or to determine the qualifications of their pipeline Construction and Welding Inspector, R.L.D. and his ability to perform covered tasks.*

Response:

- WTUC accepts GP October 21, 2011 response regarding R.L.D. qualifications to perform the covered tasks of a weld inspector such as weld inspection and welder qualification testing.
- R.L.D. did not perform covered tasks outside of the scope of weld inspection duties.

**25.1 49 CFR §192,807 Recordkeeping.**

*GP did not have the following records that demonstrate operator qualification compliance for their pipeline contractor, Alaska Continental Pipeline Company.*

Response:

- GP has added a summary of qualification requirements for pipeline contractors to the O&M manual in Section 3.9. See Attachment 1.

- GP will implement the use of a Pipeline Maintenance Construction Checklist. See attachment 4.
- GP will train employees responsible for hiring pipeline contractors on the procedures to review, approve and retain of operator qualification records for contractors.
- GP provided a supplemental response to this item in our January 18, 2012 letter.

**25.2 49 CFR §192.807 Recordkeeping.**

*GP did not have the following records that demonstrate operator qualification compliance for their non-destructive testing contractor, Oregon Washington Laboratories.*

Response:

- GP has added a summary of qualification requirements for pipeline contractors to the O&M manual in Section 3.9. See Attachment 1
- GP will implement the use of a Pipeline Maintenance Construction Checklist. See attachment 4.
- GP will train employees responsible for hiring pipeline contractors on the procedures to review, approve and retain of operator qualification records for contractors.

**25.3 49 CFR §192.807 Recordkeeping.**

*GP did not have the following records that demonstrate operator qualification compliance for their construction inspector, R. D., who performed covered functions.*

Response:

- GP has added a summary of qualification requirements for pipeline contractors in Section 3.9. See Attachment 1.
- GP will implement the use of a Pipeline Maintenance Construction Checklist. See attachment 4.
- GP will train employees responsible for hiring pipeline contractors on the procedures to review, approve and retain of operator qualification records for contractors.

**26. 49 CFR §192.905 How does an operator identify a high consequence area?**

*GP failed to extend their existing HCA area to coincide with the relocation/replacement of their 10" transmission pipeline located near SR-14.*

Response:

- GP submitted updated maps to the WUTC within our October 21, 2011 response. This item was accepted by the WUTC during the January 4, 2012 telephone call.

**27.4 49 CFR §192.935 What additional preventive and mitigative measures must an operator take?**

*GP failed to conduct a re-evaluation of their risk analysis additional measures after the disconnection of remote controlled valves on February 24, 2009.*

Response:

- GP has updated our Integrity Management Program plan with regard to the status of the Williams Pipeline remote control shut-off valve.
- The MOC for this change was approved on January 25, 2012 and the IMP plan was updated on the same date.
- GP will provide training to follow plan revision procedures.
- GP references and incorporates its response to item 8.13 and 27.5.

**27.5 49 CFR §192.935 What additional preventive and mitigative measures must an operator take?**

*GP failed to re-evaluate efficiency based upon changes in their shutdown capabilities, including response time, after the disconnection of their remote controlled valves on February 24, 2009.*

Response:

- GP has updated our Integrity Management Program plan with regard to the status of the Williams Pipeline remote control shut-off valve.
- The MOC for this change was approved on January 25, 2012 and the IMP plan was updated on the same date.
- GP has performed a test of the time to respond to an emergency valve closure and timed our response at 3 minutes and 40 seconds. This test was completed on October 13, 2011.
- GP references and incorporates its response to item 8.13 and 27.4.

**28.a 49 CFR §199.105 Drug tests required.**

*GP failed to ensure all applicable personnel were included in a random drug testing pool. GP failed to provide records showing R.L.D. was in a selection pool.*

Response:

- GP has added a summary of qualification requirements for pipeline contractors to the O&M manual in Section 3.9. See Attachment 1.
- GP will implement the use of a Pipeline Maintenance Construction Checklist. See attachment 4.
- GP will train employees responsible for hiring pipeline contractors to follow contractor qualification procedures.

**28.b 49 CFR §199.105 Drug tests required.**

*GP failed to ensure all applicable personnel were included in a random drug testing pool. GP failed to provide records that employee J.S. was included in a random testing pool.*

Response:

- GP provided a supplemental response to this item in our January 18, 2012 supplemental letter.

**29. 49 CFR §199.113 Employee assistance program.**

*GP did not have or did not provide reasonable cause training records for any of their supervisory personnel.*

Response:

- Training has been completed.
- GP provided a supplemental response to this item in our January 18, 2012 letter.

**30.1 49 CFR §199.115 Contractor employees.**

*GP failed to provide and maintain records which identify that their pipeline contractor, Alaska Continental Pipeline Company, complied with the drug testing, education, and training required by this part during their construction.*

Response:

- GP has added a summary of qualification requirements for pipeline contractors to the O&M manual in Section 3.9. See Attachment 1.
- GP will implement the use of a Pipeline Maintenance Construction Checklist. See attachment 4.
- GP will train employees responsible for hiring pipeline contractors to follow contractor qualification procedures.

**30.2 49 CFR §199.115 Contractor employees.**



*GP failed to maintain records which identify that their non-destructive testing contractor, Oregon Labs, complied with the drug testing, education, and training required by this part during their construction.*

Response:

- GP has added a summary of qualification requirements for pipeline contractors to the O&M manual in Section 3.9. See Attachment 1
- GP will implement the use of a Pipeline Maintenance Construction Checklist. See attachment 4.
- GP will train employees responsible for hiring pipeline contractors to follow contractor qualification procedures.

**30.3 49 CFR §199.115 Contractor employees.**

*GP failed to provide and maintain records which identify that their contractor, R. R., Principal Engineer of Cathodic Protection Engineering, Inc., complied with the drug testing, education, and training required.*

Response:

- GP provided a response to this item in our supplemental response dated January 18, 2012.
- GP required CPE to establish a testing program in April 2011.

**30.4 49 CFR §199.115 Contractor employees.**

*GP failed to provide and maintain records which identify that their pipeline construction inspector, R.L.D. (who performed covered tasks) complied with the drug testing, education, and training required by this part during the construction.*

Response:

- GP has added a summary of qualification requirements for pipeline contractors to the O&M manual in Section 3.9. See Attachment 1
- GP will implement the use of a Pipeline Maintenance Construction Checklist. See attachment 4.
- GP will train employees responsible for hiring pipeline contractors to follow contractor qualification procedures.
- R.L.D. ceased to perform work for GP Camas as of 4/24/2010 when the SR-14 construction project was completed.

**31.1 49 CFR §199.227 Retention of records.**

*GP failed to provide records showing training was provided to supervisors which qualify them to make a determination concerning the need for alcohol testing.*

Response:

- Training has been completed.
- GP provided a supplemental response to this item in our January 18, 2012 letter.

**31.2 49 CFR §199.227 Retention of records.**

*GP failed to provide records certifying that training was conducted under CFR § 199.227*

Response:

- Training has been completed.
- GP provided a supplemental response to this item in our January 18, 2012 letter.

**32. 49 CFR §199.241 Training for supervisors.**

*GP failed to provide records which identify that training was provided to any of their designated supervisory personnel qualifying them to make a determination concerning the need for alcohol testing based upon reasonable suspicion.*

Response:

- Training has been completed.
- GP provided a supplemental response to this item in our January 18, 2012 letter.

**33.1 49 CFR §199.245 Contractor employees.**

*GP failed to provide and maintain records which identify that their pipeline contractor employees from Alaska Continental Pipeline Company, complied with the alcohol testing, education, and training required.*

Response:

- GP has added a summary of qualification requirements for pipeline contractors to the O&M manual in Section 3.9. See Attachment 1.
- GP will implement the use of a Pipeline Maintenance Construction Checklist. See attachment 4.
- GP will train employees responsible for hiring pipeline contractors to follow contractor qualification procedures.

**33.2 49 CFR §199.245 Contractor employees.**

*GP failed to provide and maintain records which identify that their non-destructive testing (NDT) contractor employees from Oregon Washington Laboratories, complied with the alcohol testing, education, and training required.*

Response:

- GP has added a summary of qualification requirements for pipeline contractors to the O&M manual in Section 3.9. See Attachment 1
- GP will implement the use of a Pipeline Maintenance Construction Checklist. See attachment 4.
- GP will train employees responsible for hiring pipeline contractors to follow contractor qualification procedures.

**33.3 49 CFR §199.245 Contractor employees.**

*GP failed to provide and maintain records which identify that their contractor, R. R., Principal Engineer of Cathodic Protection Engineering, Inc., complied with the alcohol testing, education, and training required.*

Response:

- GP provided a response to this item in our supplemental response email dated January 18, 2012.

**33.4 49 CFR §199.245 Contractor employees**

*GP failed to provide and maintain records which identify that their pipeline construction inspector, R.L.D. (who completed covered tasks), complied with the alcohol testing, education, and training required.*

Response:

- GP has added a summary of qualification requirements for pipeline contractors to the O&M manual in Section 3.9. See Attachment 1.
- GP will implement the use of a Pipeline Maintenance Construction Checklist. See attachment 4
- GP will train employees responsible for hiring pipeline contractors to follow contractor qualification procedures.
- R.L.D. ceased to perform work for GP Camas as of April 24, 2010 when the SR-14 construction project was completed.

## **AREAS OF CONCERN**

1. **WAC 480-93-018 Records.**

*GP leak survey records lack attention to accuracy/detail.*

Response:

- GP's October 21, 2011 response to this item was verbally accepted by the WUTC during the January 4, 2012 phone call.

2. **WAC 480-93-110 Corrosion Control.**

*GP Procedure 3.3.9 Remedial Action states that GP will make arrangements to correct the problem within 90 days. This procedure should be corrected to state remedial action shall be completed within 90 days.*

Response:

- GP's October 21, 2011 response to this item was verbally accepted by the WUTC during the January 4, 2012 phone call.

3. **WAC 480-93-180 Plans and procedures.**

*GP does not have detailed procedures for the acceptance/review and monitoring of hydrostatic tests.*

Response:

- GP's October 21, 2011 response to this item was verbally accepted by the WUTC during the January 4, 2012 phone call.

4. **WAC 480-93-180 Plans and procedures.**

*GP's Public Awareness Procedures Sections 2.1, 2.2, and 2.3 incorrectly references Section 3.4 Pipeline Marking Plan rather than the intended Section 2.4 Safety Considerations.*

Response:

- Accepted per phone conference January 4, 2012 by WUTC.

5. **WAC 480-93-185 Gas leak investigation.**

*Correct GP Procedure 3.2.3 to include the "property owner or adult occupant" language in accordance with this rule.*

Response:

- GP's October 21, 2011 response to this item was verbally accepted by the WUTC during the January 4, 2012 phone call.

6. **49 CFR §199.3 Definitions.**

*GP's definition for "Operator" is incomplete under this regulation.*

Response:

- GP's October 21, 2011 response to this item was verbally accepted by the WUTC during the January 4, 2012 phone call.

7. **49CFR §192.105 Design formula for steel pipe.**

*Records show that GP failed to design for their transmission pipeline until after they completed pipeline construction.*

Response:

- GP will follow engineering practices to detail components and design calculations prior to purchasing and construction activities.

8. **49 CFR §192.225 Welding Procedures.**

*Section IX of ASME (July 2007) requires Qualified Welding Procedures to be updated (without requiring re-qualification of the procedure) to reflect change in ownership and acceptance of the procedure.*

Response:

- GP natural gas weld procedure JR-SM-P1G has been amended (Rev. 2, January 13, 2012) to show Georgia Pacific name in place of James River Corporation.
- GP provided a response to this item in our supplemental response dated January 18, 2012.

9. **49 CFR §192.229 Limitations on welders.**

*GP has not consistently re-qualified their own welders without exceeding the regulation mandated 6 calendar month time requirement.*

Response:

- GP's October 21, 2011 response to this item was verbally accepted by the WUTC during the January 4, 2012 phone call.

10. **49 CFR §199.101 Anti-drug plan.**

*GP failed to post their Alcohol Misuse and Anti-drug Plans in the manner identified in the plans. GP states the plans shall be posted, in their entirety, on various work location bulletin boards.*

Response:

- GP's October 21, 2011 response to this item was verbally accepted by the WUTC during the January 4, 2012 phone call.

**11. 49 CFR §199.202 Alcohol misuse plan.**

*GP's Alcohol Misuse Prevention Plan IV(A)(1) Alcohol Tests Required - Pre-Employment Plan mimics the regulation.*

Response:

- GP's October 21, 2011 response to this item was verbally accepted by the WUTC during the January 4, 2012 phone call.

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

*Each gas pipeline company must have a written atmospheric corrosion control monitoring program.*

Response:

- O&M Manual section 3.3 Corrosion Control has been thoroughly reviewed. GP determined that all necessary information was contained within the procedures the procedures were updated for clarity.
- GP will implement the use of the "Atmospheric Corrosion Inspection" form to document and record this inspection activity. See attachment 7.
- O&M manual section 3.3.6.4 provides written atmospheric corrosion monitoring procedures.

**List of Attachments:**

1. Summary of Qualification Requirements for Pipeline Contractors
2. Design Document Revision History
3. Percent of SMYS during 2010 Hydrostatic Pressure Test
4. Pipeline Maintenance Construction Checklist
5. Public Awareness Communication Form
6. Example of Valve Inspection Report
7. Atmospheric Corrosion Inspection Form
8. Listing of Public Liaison Officials
9. Listing of Excavators
10. GP January 18, 2012 Supplemental Response Letter.