

STATUS REPORT¹ - SECTION I

1. **WAC 480-93-015 Odorization of gas.** *GP failed to provide annual calibration records for its Heath Odorator for 2009.*

GP will update its O&M Manual, Section 3.1.2. GP will perform and record monthly calibration checks on its odorization equipment and will change the annual calibration month to January. GP will provide training for new procedures prior to implementing this update.

Due Date: August 31, 2012

2. **WAC 480-93-017 Filing requirements for design, specification and construction procedures.** *GP failed to conform to its O&M Manual Section 4.6 regarding construction procedures, design, and specifications which requires a minimum fitting grade specification of Y-52 fittings. GP's design and construction records both specified Y-42 fittings.*

GP provided records showing the grade of the installed pipe fittings as Y-52. GP commits to ensuring consistency in its procedures, construction, design, and specifications records for future projects.

Completed.

- 3.1 **WAC 480-93-018 Records.** *GP failed to provide records which demonstrate its pipeline contractor employees from Alaska Continental Pipeline Company complied with the operator qualifications required by this rule for GP's 2010 SR-14 pipeline construction project.*

GP will arrange for UTC staff to review Washington Oregon Laboratory nondestructive test (NDT) film for all pipeline welds associated with the 2010 SR-14 pipeline construction project.

Due Date: August 31, 2012

GP added a summary of qualifications requirements for pipeline contractors to its O&M Manual, Section 3.9.

Completed.

GP will implement a Pipeline Maintenance and Construction Checklist. GP will train employees responsible for hiring pipeline contractors on the procedures to obtain, review, approve, and retain operator qualification records for contractors.

Due Date: August 31, 2012

¹ GP may use a different format for the O&M Manual revisions (with different Section headings) subject to review by UTC Staff.

- 3.2 WAC 480-93-018 Records.** *GP failed to maintain records which identify that its non-destructive testing contractor employees from Oregon Washington Laboratories complied with operator qualifications required by this rule for GP's 2010 SR-14 pipeline construction project.*

GP added a summary of qualification requirements for pipeline contractors to its O&M Manual, Section 3.9.

Completed.

GP will implement a Pipeline Maintenance Construction Checklist. GP will train employees responsible for hiring pipeline contractors on the procedures to obtain, review, approve, and retain operator qualification records for contractors.

Due Date: August 31, 2012

- 3.3 WAC 480-93-018 Records.** *GP failed to provide accurate construction records detailing the line pipe ordered and used for GP's 2010 SR-14 pipeline construction project.*

GP provided records which show despite inconsistencies between GP's Plans and Procedures Manual, design specifications, and construction specifications, GP was able to prove the grade of the installed line pipe as grade X-42/X-52. GP commits to ensuring consistency in its procedures, construction, design, and specifications records for future projects.

Completed.

- 3.4 WAC 480-93-018 Records.** *GP failed to provide records showing that GP's jeeped¹ its 2010 SR-14 pipeline construction project.*

GP has compiled new tables and procedures (effective 02.01.12) to address appropriate voltage parameters and procedures for coating types and thicknesses. GP has identified that corrective action includes adding an Operator Qualification Coating Repair Procedure (OQ-004) to the O&M Manual. GP has verified that the voltage parameters in its procedures are appropriate for its pipe coating material and thickness.

Due Date: August 31, 2012

- 3.5 WAC 480-93-018 Records.** *GP failed to provide staff with a copy of its Annual Report (DOT Form PHMSA 7100.2.1) for its Gas Transmission System.*

GP provided this report with its October 21, 2011, Letter of Intent.

¹ "Jeep" refers to portable equipment used to induce an electrical current onto a pipe for the purpose of detecting deformities in the pipe coating.

Completed.

- 3.6 WAC 480-93-018 Records.** *GP failed to keep accurate design, construction, and/or installation records for its 2010 SR-14 pipeline construction project.*

GP corrected and then resubmitted accurate design, construction and installation records for the SR-14 pipeline project. GP submitted calculations and records proving the maximum SMYS attained during hydrostatic pressure testing for the SR-14 project did not exceed 50%. GP submitted an amended O&M Manual Section 4.8, Pressure Testing, to specify safety requirements for testing at or above 50% SMYS.

Completed.

GP will add this amended section to its O&M Manual, Section 4.8, Pressure Testing.

Due Date: August 31, 2012

- 3.7 WAC 480-93-018 Records.** *GP failed to provide records identifying its contact and liaison program information with public officials.*

GP will update its O&M Manual Section 3.7 to identify the filing location of the public liaison list and how that list and the liaison contacts with public officials will be maintained. GP will provide training.

Due Date: August 31, 2012

- 3.8 WAC 480-93-018 Records.** *GP failed to provide records which evidence the content and delivery of its Public Awareness stakeholder messages.*

GP will update its O&M Manual Section 3.7 to reference GP's Public Awareness Plan location in the Manual.

Due Date: August 31, 2012

GP will provide employee training on records content and delivery of Public Awareness stakeholder messages and recordkeeping.

Due Date: August 31, 2012

- 3.9 WAC 480-93-018 Records.** *GP failed to update its maps within 6 months of when it completed any construction activity.*

GP has updated its pipeline maps.

Completed.

GP will accurately update its construction drawings.

Due Date: August 31, 2012

GP will provide training to affected employees in following procedures and in updating documentation and records.

Due Date: August 31, 2012

3.10 WAC 480-93-018 Records. *GP failed to record its Odorator calibration and periodic tests.*

GP commits to follow its O&M Manual, Section 3, Appendix B, Calibration and Periodic Test Records, and record all periodic tests and calibration in accordance with that section.

Completed.

GP will change its annual calibration date to the month of January.

Due Date: August 31, 2012

3.11 WAC 480-93-018 Records. *GP failed to maintain its valve inspection records for 2008, 2009, 2010 and 2011.*

GP commits to implement the "Valve Inspection and Repair" forms in its O&M Manual.

Completed.

GP will provide corrective training to use and maintain the proper forms for valve inspections, and will continue to do so.

Due Date: August 31, 2012

4.1 WAC 480-93-110 Corrosion Control. *GP failed to provide recalibration records for its multi-meters for the calendar years 2009, 2010, and 2011.*

GP commits to maintain the multi-meter calibration records (not the inspection contractor) and to maintain proof of calibration with each cathodic protection report.

Completed.

4.2 WAC 480-93-110 Corrosion Control. *GP failed to provide accuracy check records for its copper/copper sulfate (half-cells) for the calendar years 2009, 2010, and 2011.*

GP will update its O&M Manual to require copper/copper sulfate (half-cells) cathodic protection equipment and instrumentation accuracy testing, and include instrument calibration requirements that meet or exceed manufacturer's

requirements. GP will provide training in the use of copper/copper sulfate (half-cells), accuracy testing, and calibration training. GP will provide training to follow recordkeeping requirements.

Due Date: August 31, 2012

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.*

GP will add clarifying language to its O&M Manual, Section 3.3 and 3.3.6.4, to require the recording of discrete measurements when measuring pipe wall loss due to corrosion rather than a range. GP will implement an "Atmospheric Corrosion Inspection" form to record atmospheric corrosion monitoring and inspection activities. GP will also reference its applicable coating procedures under these Sections.

Due Date: August 31, 2012

- 6 **WAC 480-93-160 Reporting requirements of proposed construction.** *GP failed to file its proposed construction report with the commission at least forty-five days prior to the replacement of its pipeline running parallel to SR-14.*

GP will provide training to follow O&M Manual, Procedure 4.17, which specifies that GP notify the UTC prior to specific pipeline construction activities.

Due Date: August 31, 2012

- 7.1 **WAC480-93-180 Plans and procedures.** *GP failed to record details of its leaks and leak investigations for 2008, 2009, and 2010.*

GP will train leak responders to follow procedures and document activities on the "Leak Survey" form.

Due Date: August 31, 2012

GP will re-qualify all leak responders.

Due Date: August 31, 2012

- 7.2 **WAC 480-93-180 Plans and procedures.** *GP failed to follow its Alcohol Misuse Prevention Plan (AMPP) procedures under XIV (D)(1) Contractor Monitoring - Qualifying Potential Contractor(s).*

GP will add a summary of qualification requirements for pipeline contractors to the O&M manual in Section 3.9. GP will implement a Pipeline Maintenance Construction Checklist. GP will train employees responsible for hiring pipeline contractors to follow contractor qualification procedures.

Due Date: August 31, 2012

- 7.3 WAC 480-93-180 Plans and procedures.** *GP failed to follow its Alcohol Misuse Prevention Plan (AMPP) procedures under XIV(D)(2) Contractor Monitoring-Monitoring Contractor's Compliance.*

GP will add a summary of qualification requirements for pipeline contractors to the O&M manual in Section 3.9. GP will implement a Pipeline Maintenance Construction Checklist. GP will train employees responsible for hiring pipeline contractors to follow contractor qualification procedures.

Due Date: August 31, 2012

- 7.4 WAC480-93-180 Plans and procedures.** *GP failed to follow its Alcohol Misuse Prevention Plan (AMPP) procedures under XIV(D)(4) Contractor Monitoring-Statistical Record Retention.*

GP will add a summary of qualification requirements for pipeline contractors to the O&M manual in Section 3.9. GP will implement a Pipeline Maintenance Construction Checklist. GP will train employees responsible for hiring pipeline contractors to follow contractor qualification procedures.

Due Date: August 31, 2012

- 7.5 WAC 480-93-180 Plans and procedures.** *GP failed to update its O&M manual with the correct AP/1104 reference.*

GP commits to complete an annual review of the O&M Manual and update all required incorporated references.

Due Date: August 31, 2012, and annually thereafter

GP will train employees to follow procedures and applicable recordkeeping requirements.

Due Date: August 31, 2012

- 7.6 WAC 480-93-180 Plans and procedures.** *GP failed to follow its procedures in O&M Manual, Section 4.6, Materials, which requires a minimum fitting grade specification Y-52.*

GP provided records which show that despite inconsistencies between GP's Plans and Procedures Manual, design specifications, and construction specifications, GP proved the grade of the installed line pipe fittings was Y-52. GP commits to ensure consistency in its procedures, construction, design, and specifications records for future projects.

Completed.

- 7.7 WAC 480-93-180 Plans and procedures.** *GP failed to follow its procedures regarding contractor requirements for Permanent Repairs in Section 4.*

GP will add a summary of qualification requirements for pipeline contractors to the O&M Manual, Section 3.9. GP will implement a Pipeline Maintenance Construction Checklist. GP will train employees responsible for hiring pipeline contractors to follow contractor qualification procedures.

Due Date: August 31, 2012

- 7.8 WAC 480-93-180 Plans and procedures.** *GP failed to follow its Section 11.0 Radiographic Procedures Details dated 04.09.09.*

GP will provide training to ensure pipeline personnel follow non-destructive testing (NDT) procedures. GP will establish a frequency for this training and include that in its O&M Manual.

Due Date: August 31, 2012

- 7.9 WAC 480-93-180 Plans and procedures.** *GP failed to update its procedures with the correct API Standard 1104, "Welding of Pipelines and Related Facilities."*

GP commits to complete an annual review of the O&M Manual and update all required incorporated references.

Due Date: August 31, 2012, and annually thereafter

GP will train employees to follow procedures and applicable recordkeeping requirements.

Due Date: August 31, 2012

- 7.10 WAC 480-93-180 Plans and procedures.** *GP failed to follow its O&M Manual Section 4.16, by failing to file a proposed construction report with the commission at least forty-five days prior to construction.*

GP will provide training to follow procedure 4.17 in our O&M Manual which specifies WUTC notification requirements prior to construction activities. GP will establish a frequency for this training and include that in GP's O&M Manual.

Due Date: August 31, 2012

- 7.11 WAC 480-93-180 Plans and Procedures.** *GP did not file revisions to its O&M Manual with the commission annually.*

GP commits to filing revisions to its Manual annually with the commission.

Completed.

GP will update its O&M Manual Section 3.8.23 which requires GP to review its O&M Manual annually and appoint oversight responsibility to GP's Reliability Leader. See also 7.5.

Due Date: August 31, 2012.

- 7.12 WAC 480-93-180 Plans and procedures.** *GP failed to record its Odorator periodic test records every 30 days and annually (re-calibration requirement) in accordance with GP Procedures Section 3 Appendix B Calibration and Periodic Test Records.*

GP has retrained an inspection contractor to properly document the periodic (monthly) tests of the Odorator by using the form in GP's O&M Manual. See also 1.

Completed.

- 7.13 WAC 480-93-180 Plans and procedures.** *GP failed to follow its O&M Manual procedure OQ-006 regarding patrolling the pipeline. GP's patrolling records are in a summary format and actual patrol inspection records were not available. All items to be reviewed during patrolling were not included in the summary leaving no way to verify whether all items were reviewed during patrols conducted in January 2010 and February 2010.*

GP commits to follow procedure OQ-006 relating to patrolling the pipeline. GP will require its contractor's to properly use the form related to that procedure. GP will continue to provide training to employees and contractors to follow the procedure. GP will establish a frequency for this training and include that frequency in its O&M Manual.

Due Date: August 31, 2012

- 7.14 WAC 480-93-180 Plans and procedures.** *GP failed to use the Valve Inspection and Repair Form required by O&M Manual procedure Section 3.1.5, Valve Inspection Form: "One form is to be completed for each valve, each time it is inspected, repaired, or replaced"*

GP commits to follow the applicable procedures in its O&M Manual, Section 3.1.5, Valve Inspection, including compliance record keeping. GP has provided corrective training on the use of the Valve Inspection and Repair Form in the O&M.

Completed.

GP will continue to provide training to employees and contractors to use the proper O&M manual forms. GP will establish a frequency for that training and include that frequency as part of the O&M Manual.

Due Date: August 31, 2012

- 7.15 WAC 480-93-180 Plans and procedures.** *GP failed to follow PA Program*

Procedure 10.0 Program Documentation and Record Keeping. GP failed to provide records that show that it completed a Public Awareness Program Evaluation on or before June 20, 2010.

GP will update Section 10 of its Public Awareness Plan to require the use of a "Public Awareness Communication" form to maintain a log of the program implementation activities.

Due Date: August 31, 2012

GP will incorporate a reference to the Public Awareness Plan in its O&M Manual, Section 3.7. See also 3.8.

Due Date: August 31, 2012

- 7.16 WAC 480-93-180 Plans and procedures.** *GP failed to follow PA Program Procedure 11.0 Program Evaluation. GP failed to provide records or documentation to support its conclusions regarding the effectiveness of its Public Awareness Program.*

GP will update its Public Awareness Plan to include the additional requirement to evaluate if there has been a statistical decline in damage incidents/near misses and/or an increase in the use of One-Call systems.

GP will begin use of the "Public Awareness Communication" form to monitor and track program activity. GP will add language in that Section for Program Evaluation procedures per 49 C.F.R. § 192.616(b). See also 7.15 and 3.8.

Due Date: August 31, 2012

GP must maintain records and/or documentation to support its conclusions regarding the evaluation of the public awareness program's effectiveness.

Due Date: Ongoing

- 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.*

GP has amended its O&M Manual, OQ-007 procedure, to provide step-by-step procedures/instructions for installation of Plidco fittings/clamps.

Completed.

- 8.2 WAC 480-93-180 Plans and procedures.** *GP does not have a procedure for jeeeping, calibration of the jeeeping equipment, and the related documentation (Forms)*

and record requirements.

GP has amended its O&M Manual, OQ-004 procedure for Coating Repair to include inspection of new pipe coating and coating repairs and GP commits to update this same procedure to include maximum amperage limits/coating type and thickness and voltage recommendations for various coatings. GP has updated its procedures to list voltage recommendations for various coatings. GP has verified that the voltage parameters to ensure the maximum amperage limits are appropriate for the pipeline's coating material and thickness.

Completed.

8.3 WAC 480-93-180 Plans and procedures. *GP does not have a procedure for the review and acceptance criteria of hydrostatic tests.*

GP has amended its O&M Manual, Section 4.8, Test Acceptance, relating to review and acceptance criteria of hydrostatic pressure testing and recordkeeping.

Completed.

8.4 WAC 480-93-180 Plans and procedures. *GP does not have a procedure establishing minimum cover requirements.*

GP has amended its O&M Manual, Section 4.16, Installation of Pipe in Trench. Cover and Clearance Requirements to address minimum depth of cover requirements. GP reassigned Filing Requirements (originally in Section 4.16) to Section 4.17.

Completed.

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. GP's O&M Manual Procedure 4.8(7) and (8) only mimic WAC 480-93-170(10) for procedures dated April 9, 2009, and June 30, 2011.*

GP will update its O&M Manual, Section 4.8 {8} to require annual calibration or accuracy checks for pressure testing equipment in the absence of OEM requirements. GP will provide training and incorporate a required training frequency in the O&M Manual.

Due Date: August 31, 2012

GP has verified that O&M procedure 4.8 {8} specifies that the testing equipment is to be tagged with the calibration expiration date.

Completed.

8.6 WAC 480-93-180 Plans and procedures. *GP's procedural manual fails to identify which records GP will retain for the purposes of proving its compliance with its*

Damage Prevention Program, including a list of excavators and the public in the vicinity of its pipeline.

GP will update its O&M Manual, Section 3.7, to specify that damage prevention recordkeeping will be performed in conjunction and accordance with Public Awareness Program Section 11.0. GP will implement a new "Public Awareness Communication" form to document these activities. GP will update its Damage

Prevention Program Plan and Procedures Manual to identify the specific record(s) GP will retain in accordance with 49 CFR 192.614 and WAC 480-93-018. See also 3.7.

Due Date: August 31, 2012

GP updated its current list of excavators.

Completed.

- 8.7 WAC 480-93-180 Plans and procedures.** *GP's procedures fail to include sufficient detail required for administering, contacting and completing its liaison program with public officials. For those public officials that are continually invited but do not attend a meeting, PHMSA Office of Pipeline Safety has suggested that compliance can be demonstrated through documentation of records such as, a roster of invited entities, meeting minutes, an attendance list and return receipts indicating the minutes were sent to those not attending.*

GP will update its O&M Manual, Section 3.7, to identify where the public liaison list is filed and how that list is maintained. GP will maintain an accurate liaison list of Public Officials. GP will provide training and incorporate a required training frequency in the O&M Manual.

Due Date: August 31, 2012

- 8.8 WAC 480-93-180 Plans and procedures.** *GP's procedures do not identify recalibration intervals/requirements for its odorant testing equipment.*

GP has updated its O&M Manual, Section 3.1.2 to address recalibration intervals and requirements for odorant testing equipment. GP has re-trained its inspection contractor to properly document monthly checks by using the form in the O&M Manual. See also 1.

Completed.

- 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.*

GP has updated its O&M Manual, procedure 3.4, Pipeline Marking Plan, to include

procedures for repair of damaged and/or missing pipeline markers within 45 days of discovery.

Completed.

- 8.10 WAC 480-93-180 Plans and procedures.** *GP does not have a procedure for checking the accuracy and calibration of its half-cells.*

GP will update its O&M Manual to require copper/copper sulfate (half-cells) cathodic protection equipment and instrumentation accuracy testing, and include instrument calibration requirements that meet or exceed those required by the manufacturer's requirements. GP will provide training in the use of copper/copper sulfate (half-cells), accuracy testing, and calibration training. GP will provide training to follow recordkeeping requirements.

Due Date: August 31, 2012

- 8.11 WAC 480-93-180 Plans and procedures.** *GP's atmospheric corrosion control procedures in its O&M Manual, Section 3.3.6.4 failed to include sufficient detail and clear and concise direction for conducting, remediating, monitoring and recording pipeline atmospheric corrosion control inspections/issues. GP also failed to include remediation time frames.*

GP will update its O&M Manual, Section 3.3, Corrosion Control to include a specific reference to its applicable coating and atmospheric corrosion control procedures. GP will implement the use of an "Atmospheric Corrosion Inspection" form to document and record inspection activity. GP will provide training on compliance with these procedures.

Due Date: August 31, 2012

- 8.12 WAC 480-93-180 Plans and procedures.** *GP's O&M Manual, procedure Section 3.3.7, failed to include sufficient detail and the required clear and concise direction for conducting remediation of atmospheric corrosion control. GP also failed to include remediation time frames.*

GP will implement the use of an "Atmospheric Corrosion Inspection" form to document and record inspection activity. GP will update its O&M Manual under all relevant subsections of Section 3 to include sufficient detail and clear and concise direction for corrective action to cure identified atmospheric corrosion, including remediation timeframes. GP will provide training to employees and contractors on these procedures.

Due Date: August 31, 2012

- 8.13 WAC 480-93-180 Plans and procedures.** *GP failed to correct its IMP procedures in its O&M Manual, Section 8.7, Preventative and Mitigative Measures after the*

disconnection of remote controlled shut-off valves on February 24, 2009.

GP updated its Integrity Management Program (IMP) to correct the actual status of the Williams Pipeline remote control shut off valve.

Completed.

GP will file with the commission GP's Management of Change (MOC) documentation for the installation of the remote control shut off valve(s). GP will provide training regarding O&M Manual changes. See also 27.4.

Due Date: August 31, 2012

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 its annual leak surveys originated from a foreign source on October 25, 2008, September 19, 2009, and October 2, 2010, or October 16, 2010 (exact survey date unknown).*

GP will train leak responders to follow procedures and document its activities on the "Leak Survey" forms identified in its O&M Manual. GP will re-qualify all leak responders.

Due Date: August 31, 2012

10. **WAC 480-93-186 Leak evaluation.** *GP failed to use a CGI for leaks discovered during its annual leak surveys conducted in October 25, 2008, September 19, 2009, and October 2, 2010 or October 16, 2010 (exact survey date unknown).*
GP will update its O&M Manual to require the mandatory use of combustible gas indicator (CGI) equipment to investigate leaks. GP will provide recordkeeping training, including training employees and contractors to record all CGI findings.

Due Date: August 31, 2012

11. **WAC 480-93-187 Gas leak records.** *GP failed to record the magnitude and/or location of CGI reads taken during leak investigations on October 25, 2008, September 19, 2009, and October 2, 2010, or October 16, 2010 (exact date unknown).*

GP will provide employees and contractors with leak investigation recordkeeping training.

Due Date: August 31, 2012

12. **WAC 480-93-188 Gas leak surveys.** *GP's leak survey records failed to include maps for the annual leak survey inspections which occurred on October 25, 2008, September 19, 2009, and October 2, 2010 or October 16, 2010, (exact date unknown).*

GP has provided training to its inspection contractor to follow the gas leak survey procedure requiring the use of maps.

Completed.

- 13. WAC 480-93-188 Gas leak surveys.** *GP failed to perform effective self-audits ensuring its records were accurate and complete. GP procedures specify the use of leak investigation forms entitled "O&M Manual, Gas Leak and Repair Report". GP failed to use these forms. Other records did not contain the detail necessary to determine compliance.*

GP will update the O&M Manual to clarify the self-audit requirements must be observed as frequently as necessary, but not to exceed three years between audits.

Due Date: August 31, 2012

GP commits that these self-audits meet the minimum requirements identified in WAC 480-93-188.

Completed.

- 14. 49 CFR §192.105 Design formula for steel pipe.** *GP failed to complete its design calculations in accordance with this regulation. The pipe grade used for GP's 2010 SR-14 pipeline construction project has been specified as X-42 (with a yield strength of 42,000psi) but the yield strength used in the design formula is 52,000 psi.*

GP corrected and then resubmitted accurate design, construction and installation records for GP's 2010 SR-14 pipeline construction project. GP submitted records proving the yield strength of 52,000psi for the line pipe used in that project.

Completed.

- 15.1 49 CFR §192.225 Welding Procedures.** *GP failed to qualify its welding procedures in accordance with CFR §192.225. The welding procedure qualification records do not contain required information for essential variables, such as travel time, time lapse between passes, and valid pre-heat requirements. Example: pre-heat requirements are identified as "Ambient to >50°F" and "Ambient to >75°F".*

GP will make the following changes to its qualified welding procedure GP CAMAS-01 and to its O&M Manual:

- a. Update the welding procedure specifications table to cover the pipe and wall thickness of GP's system and clearly indicate the number of passes.
- b. Clearly specify the range of speed of travel for each pass.
- c. Clearly specify the time between the completion of the second bead and the start of the others.

- d. Clearly state the method of preheat application and the method of temperature control.
- e. Reduce the specified amperage range of 120-190 for pipeline welding with 1/8 E 6010.

Due Date: August 31, 2012

15.2 49 CFR §192.225 Welding Procedures. *GP construction documents contain a welding procedure WPS GP CAMAS-01 dated 09.19.02. This welding procedure is not identified as a qualified welding procedure in the GP procedures manual. GP failed to provide records evidencing this procedure as a qualified welding procedure.*

GP will make the following changes to welding procedure GP CAMAS-01 and to its O&M Manual: (Also see 15.1)

- a. Update the welding procedure specifications table to cover the pipe and wall thickness of GP's system and clearly indicate the number of passes.
- b. Clearly specify the range of speed of travel for each pass.
- c. Clearly specify the time between the completion of the second bead and the start of the others.
- d. Clearly state the method of preheat application and the method of temperature control.
- e. Reduce the specified amperage range of 120-190 for pipeline welding with 1/8 E 6010.

Due Date: August 31, 2012

GP shall remove welding procedure JR_SM_P1G from its plans and procedures manual until GP properly qualifies the new version of the welding procedure, or replaces this procedure with the original qualified procedure updating it to reflect the change in ownership and acceptance of the procedure. Also see AOC 8.

Due Date: August 31, 2012

16.a 49 CFR §192.227 Qualification of Welders. *GP failed to provide records showing qualification of welders for CFR 192.227. The welder qualification test report records for the Alaska Continental Pipeline employee with the initials "P.H." showed that P.H. failed to complete the welder qualification process until well after completion of GP's 2010 SR-14 pipeline construction project.*

GP added a summary of qualification requirements for pipeline contractors to its O&M Manual.

Completed.

GP will implement a Pipeline Maintenance Construction Checklist and will train employees responsible for hiring pipeline contractors on the procedures to obtain,

review, approve, and retain operator qualification records and drug and alcohol for contractors and subcontractors prior to covered task work.

Due Date: August 31, 2012

- 16.b 49 CFR §192.227 Qualification of Welders.** *GP failed to provide records showing qualification of welders. The welder qualification test report records for Alaska Continental Pipeline employee with the initials P.H. failed to identify a qualified procedure used to qualify its welder.*

GP added a summary of qualification requirements for pipeline contractors to its O&M Manual.

Completed.

GP will implement a Pipeline Maintenance Construction Checklist and will train employees responsible for hiring pipeline contractors on the procedures to obtain, review, approve, and retain operator qualification records and drug and alcohol for contractors and subcontractors prior to covered task work. GP will include complete test details in conjunction with its welder test records.

Due Date: August 31, 2012

- 16.c 49 CFR §192.227 Qualification of Welders.** *GP failed to provide records showing qualification of welders for CFR 192.227. The welder qualification test report records for Alaska Continental Pipeline employee with the initials "P.H." failed to include face/root bend and nick break test details.*

GP has added a summary of qualification requirements for pipeline contractors to its O&M Manual.

Completed.

GP will implement a Pipeline Maintenance Construction Checklist and will train employees responsible for hiring pipeline contractors on the procedures to obtain, review, approve, and retain operator qualification records and drug and alcohol for contractors and subcontractors prior to covered task work. GP will include complete test details in conjunction with its welder test records.

Due Date: August 31, 2012

- 16.d 49 CFR §192.227 Qualification of Welders.** *GP failed to provide records showing qualification of welders for CFR 192.227. The welder qualification test report records for Alaska Continental Pipeline employee with the initials "P.H." show GP failed to include essential variables used in the welding process. (Essential variables are set forth in API Standard 1104, Section 5.4, "Essential Variables".)*

GP added a summary of qualification requirements for pipeline contractors to its O&M Manual.

Completed.

GP will implement a Pipeline Maintenance Construction Checklist and will train employees responsible for hiring pipeline contractors on the procedures to obtain, review, approve, and retain operator qualification records and drug and alcohol for contractors and subcontractors prior to covered task work. GP will include complete test details in conjunction with its welder test records.

Due Date: August 31, 2012

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 on GP's 2010 SR-14 construction project were qualified to visually inspect welds:*
- a. *R.L.D., GP's Contract Welding and Construction Inspector*
 - b. *P.H., Alaska Continental Pipeline Employee*

GP added a summary of qualification requirements for pipeline contractors to its O&M Manual.

Completed.

GP will implement a Pipeline Maintenance Construction Checklist and will train employees responsible for hiring pipeline contractors on the procedures to obtain, review, approve, and retain operator qualification records and drug and alcohol for contractors and subcontractors prior to covered task work. GP will include complete test details in conjunction with its welder test records.

Due Date: August 31, 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.*

GP corrected and then resubmitted accurate design, construction and installation records for GP's SR-14 pipeline construction. GP's resubmitted records proving the maximum SMYS attained during hydrostatic pressure testing for the SR-14 project did not exceed 50% and therefore, GP was not required to take additional protective steps.

Completed.

GP will amend its O&M manual section 4.8 Pressure Testing to specify the additional safety requirements for testing at or above 50% SMYS.

Due Date: August 31, 2012

19. **49 CFR §192.605 Procedural manual for operations, maintenance, and emergencies.** *GP failed to review and update its O&M Manual at the required intervals between March 2009 and December 2010.*

GP will update its O&M Manual, Section 3.8.23, which requires GP to review its O&M Manual annually, provide training, and appoint oversight responsibility to GP's Reliability Leader. See also 7.5.

Due Date: August 31, 2012

20. **49 CFR §192.614 Damage prevention program.** *GP's O&M Manual, Section 3.7, Damage Prevention failed to identify a current list of excavators.*

GP has updated its O&M Manual Section 3.7 to specify how and where its list of excavators is filed and maintained.

Completed.

GP will provide training on this item to its employees and contractors.

Due Date: August 31, 2012

21. **49 CFR §192.614 Damage prevention program.** *GP's O&M Manual, Section 3.7, Damage Prevention, failed to identify the members of the public located in the vicinity of the pipeline.*

GP will update its O&M Manual, Section 3.7, to identify the members of the public located in the vicinity of the pipeline and will provide training on this item to its employees and contractors..

Due Date: August 31, 2012

22. **49 CFR §192.615 Emergency plans.** *GP failed to identify, establish, and maintain liaison with appropriate public officials.*

GP will update its O&M Manual, Section 3.7, to identify where the public liaison list is filed and how the list will be maintained. GP will and will provide training to its employees and contractors on this item.

Due Date: August 31, 2012

- 23.1 **49 CFR §192.616 Public Awareness.** *GP failed to implement and deliver its baseline message information in accordance with its written Public Awareness program. Although GP provided notification to stakeholders on 03.16.09, GP did not provide all information listed under Section 7.1, Determination of Message Type and Content for Each Stakeholder Group. GP had no records documenting this notification other than a USPS mailing receipt.*

GP will update its Public Awareness Program Manual, Section 10, to meet these recordkeeping requirements, and GP will provide recordkeeping training to its personnel.

Due Date: August 31, 2012

GP will update its O&M Manual, Section 3.7, to reference GP's Public Awareness Plan location in the Manual.

Due Date: August 31, 2012

- 23.2 49 CFR §192.616 Public Awareness.** *GP failed to provide records that show that GP completed its Public Awareness Program Evaluation on or prior to June 20, 2010. GP failed to follow O&M Manual, PA Program Procedure 10.0, Program Documentation and Record Keeping.*

GP will update its Public Awareness Plan Manual, Section 10, Attachment 5 to meet with these recordkeeping requirements, and GP will provide recordkeeping training. GP will update its O&M Manual, Section 3.7, to reference GP's Public Awareness Plan location in the Manual. GP will implement a "Public Awareness Communication" form to document and record activities and will provide employee training. GP will provide all required Public Awareness baseline message information in accordance with Public Awareness Plan Manual Section 7.1 for each stakeholder group and prepare all necessary documentation to record that contact. See also 3.8 and 7.15.

Due Date: August 31, 2012

- 23.3 49 CFR §192.616 Public Awareness.** *GP failed to provide records or documentation to support its conclusions regarding the effectiveness of its Public Awareness Program. GP failed to follow its O&M Manual, Section 11.0, Public Awareness Program Evaluation.*

GP will implement a "Public Awareness Communication" form to document and record these activities. GP will update its Public Awareness Plan Manual, Section 10, to set forth the recordkeeping requirements. GP will train its personnel on this item. GP will compile and record all required baseline message information in accordance with Public Awareness Plan Manual, Section 7.1, for each stakeholder group and prepare the necessary documentation to record that contact. This item is related to item 3.8 and 7.16.

Due Date: August 31, 2012

- 24. 49 CFR §192.805 Qualification program.** *GP failed to provide documentation to show that it had completed an evaluation process to qualify and/or to determine the qualifications of its pipeline Construction and Welding Inspector, initials "R.L.D." and that person's ability to perform covered tasks, including welding inspection, welder qualification testing, and depth of cover.*

GP has added a summary of qualification requirements for pipeline contractors to its O&M Manual.

Completed.

GP will implement a Pipeline Maintenance Construction Checklist and will train employees responsible for hiring pipeline contractors on the procedures to obtain, review, approve, and retain operator qualification records and drug and alcohol for contractors and subcontractors prior to covered task work.

Due Date: August 31, 2012

25.1 49 CFR §192.807 Recordkeeping. *GP did not have the following records that demonstrate operator qualification compliance for its pipeline contractor, Alaska Continental Pipeline Company. GP records list the names of 12 employees for this company.*

- a. Identification of the qualified individuals*
- b. Identification of the covered tasks the individual is qualified to perform*
- c. Date(s) of current qualifications*
- d. Qualification method*

GP has added a summary of qualification requirements for pipeline contractors to its O&M Manual.

Completed.

GP will implement a Pipeline Maintenance Construction Checklist and will train employees responsible for hiring pipeline contractors on the procedures to obtain, review, approve, and retain operator qualification records and drug and alcohol for contractors and subcontractors prior to covered task work.

Due Date: August 31, 2012

25.2 49 CFR §192.807 Recordkeeping. *GP did not have the following records that demonstrate operator qualification compliance for its non-destructive testing contractor, Oregon Washington Laboratories. GP records list the names of 2 employees for this company.*

- a. Identification of the qualified individuals*
- b. Identification of the covered tasks the individual is qualified to perform*
- c. Date(s) of current qualifications*
- d. Qualification method*

GP has added a summary of qualification requirements for pipeline contractors to its O&M Manual.

Completed.

GP will implement a Pipeline Maintenance Construction Checklist and will train employees responsible for hiring pipeline contractors on the procedures to obtain, review, approve, and retain operator qualification records and drug and alcohol for contractors and subcontractors prior to covered task work.

Due Date: August 31, 2012

- 25.3 49 CFR §192.807 Recordkeeping.** *GP did not have the following records that demonstrate operator qualification compliance for its construction inspector, initials "R. D.", who performed covered functions.*
- a. *Identification of the qualified individuals*
 - b. *Identification of the covered tasks the individual is qualified to perform*
 - c. *Date(s) of current qualifications*
 - d. *Qualification method.*

GP has added a summary of qualification requirements for pipeline contractors to its O&M Manual.

Completed.

GP will implement a Pipeline Maintenance Construction Checklist and will train employees responsible for hiring pipeline contractors on the procedures to obtain, review, approve, and retain operator qualification records and drug and alcohol for contractors and subcontractors prior to covered task work.

Due Date: August 31, 2012

- 26. 49 CFR §192.905 How does an operator identify a high consequence area?** *GP failed to extend its existing High Consequence Area (HCA) to coincide with the relocation/replacement of its 10" pipeline located near SR-14 and Union St., Camas.*

GP submitted updated HCA maps.

Completed.

- 27.4 49 CFR §192.935 What additional preventive and mitigative measures must an operator take?** *GP failed to conduct a re-evaluation of its risk analysis additional measures after the disconnection of remote controlled valves on February 24, 2009.*

GP will provide training to follow GP's Integrity Management Plan (IMP) revision procedures.

Due Date: August 31, 2012

GP updated its Integrity Management Plan (IMP) to correct the actual status of the Williams Pipeline remote control shut off valve and will file its Management of Change (MOC) documentation.

Completed.

GP will provide training regarding O&M Manual changes.

Due Date: August 31, 2012

- 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 its shutdown capabilities, including response time, after the disconnection of its remote controlled valves on February 24, 2009.*

GP has performed a test of the time to respond to an emergency valve closure and timed its response at 3 minutes and 40 seconds. GP completed this test on October 13, 2011. GP updated its Integrity Management Program plan to correct the actual status of the Williams Pipeline remote control shut off valve.

Completed.

GP will provide training to follow IMP plan revision procedures. GP will file its Management of Change (MOC) documentation for the installation of the remote control shut off valve(s). GP will provide training regarding O&M Manual changes.

Due Date: August 31, 2012

- 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 a person with initials "R.L.D." was in a selection pool.*

GP has added a summary of qualification requirements for pipeline contractors to its O&M Manual.

Completed.

GP will implement a Pipeline Maintenance Construction Checklist and will train employees responsible for hiring pipeline contractors on the procedures to obtain, review, approve, and retain operator qualification records and drug and alcohol for contractors and subcontractors prior to covered task work.

Due Date: August 31, 2012.

- 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 with the initials "J.S." was included in a random testing pool.*

GP has added a summary of qualification requirements for pipeline contractors to its O&M Manual.

Completed.

GP will implement a Pipeline Maintenance Construction Checklist and will train employees responsible for hiring pipeline contractors on the procedures to obtain, review, approve, and retain operator qualification records and drug and alcohol for contractors and subcontractors prior to covered task work.

Due Date: August 31, 2012

- 29. 49 CFR §199.113 Employee assistance program.** *GP did not have or did not provide reasonable cause training records for any of its supervisory personnel.*

GP has provided records showing completion of reasonable cause training for its supervisory personnel.

Completed.

GP will update its procedures and provide training to ensure training remains current.

Due Date: August 31, 2012

- 30.1 49 CFR §199.115 Contractor employees.** *GP failed to provide or maintain records which identify that its pipeline contractor, Alaska Continental Pipeline Company, complied with the drug testing, education, and training required by this part during construction of the pipeline.*

GP added a summary of qualification requirements for pipeline contractors to its O&M Manual.

Completed.

GP will implement a Pipeline Maintenance Construction Checklist and will train employees responsible for hiring pipeline contractors on the procedures to obtain, review, approve, and retain operator qualification records and drug and alcohol for contractors and subcontractors prior to covered task work.

Due Date: August 31, 2012

- 30.2 49 CFR §199.115 Contractor employees.** *GP failed to maintain records which identify that its non-destructive testing contractor, Oregon Labs, complied with the drug testing, education and training required by this part during its construction.*

GP has added a summary of qualification requirements for pipeline contractors to its O&M Manual.

Completed.

GP will implement a Pipeline Maintenance Construction Checklist and will train employees responsible for hiring pipeline contractors on the procedures to obtain,

review, approve, and retain operator qualification records and drug and alcohol for contractors and subcontractors prior to covered task work.

Due Date: August 31, 2012

- 30.3 49 CFR §199.115 Contractor employees.** *GP failed to provide or maintain records which identify that its contractor, R. R., Principal Engineer of Cathodic Protection Engineering, Inc., complied with the drug testing, education and training required.*

GP has added a summary of qualification requirements for pipeline contractors to its O&M Manual.

Completed.

GP will implement a Pipeline Maintenance Construction Checklist and will train employees responsible for hiring pipeline contractors on the procedures to obtain, review, approve, and retain operator qualification records and drug and alcohol for contractors and subcontractors prior to covered task work.

Due Date: August 31, 2012

- 30.4 49 CFR §199.115 Contractor employees.** *GP failed to provide and maintain records which identify that its pipeline construction inspector, initials "R.L.D." (who performed covered tasks) complied with the drug testing, education, and training required by this part during the construction.*

GP has added a summary of qualification requirements for pipeline contractors to its O&M Manual.

Completed.

GP will implement a Pipeline Maintenance Construction Checklist and will train employees responsible for hiring pipeline contractors on the procedures to obtain, review, approve, and retain operator qualification records and drug and alcohol for contractors and subcontractors prior to covered task work.

Due Date: August 31, 2012

- 31.1 49 CFR §199.227 Retention of records.** *GP failed to provide records showing GP provided training to supervisors to qualify them to make a determination concerning the need for alcohol testing.*

GP has provided records showing completion of reasonable cause training for its supervisory personnel.

Completed.

GP will update its procedures and provide training to ensure training remains current.

Due Date: August 31, 2012

- 31.2 49 CFR §199.227 Retention of records.** *GP failed to provide records certifying that GP conducted training in accordance with CFR §199.*

GP has added a summary of qualification requirements for pipeline contractors to its O&M Manual.

Completed.

GP will implement a Pipeline Maintenance Construction Checklist and will train employees responsible for hiring pipeline contractors on the procedures to obtain, review, approve, and retain operator qualification records and drug and alcohol for contractors and subcontractors prior to covered task work.

Due Date: August 31, 2012

- 32. 49 CFR §199.241 Training for supervisors.** *GP failed to provide records which identify that training was provided to any of its designated supervisory personnel qualifying them to make a determination concerning the need for alcohol testing based upon reasonable suspicion. GP identified the following supervisory positions are subject to training:*

- a. Reliability Leader*
- b. North Side Maintenance Leader*
- c. Salaried personnel assigned to maintenance weekend duty*

GP has provided records showing GP completed reasonable cause training for its supervisory personnel dated December 13, 2011.

Completed.

GP will update its reasonable cause training requirements in its procedures and ensure training remains current.

Due Date: August 31, 2012

- 33.1-2 49 CFR §199.245 Contractor employees.** *GP failed to provide or maintain records which indicate GP ensured the requirements for drug and alcohol testing, education and training of certain contractors' employees were complied with. The contractors were Alaska Continental Pipeline Company and Oregon Washington Laboratories.*

GP has added a summary of qualification requirements for pipeline contractors to its O&M Manual.

Completed.

GP will implement a Pipeline Maintenance Construction Checklist and will train employees responsible for hiring pipeline contractors on the procedures to obtain, review, approve, and retain operator qualification records and drug and alcohol testing, education and training for contractors and subcontractors prior to covered task work.

Due Date: August 31, 2012

- 33.3 49 CFR §199.245 Contractor employees.** *GP failed to ensure that an employee ("R.R.") of its contractor, Principal Engineer of Cathodic Protection Engineering, Inc., complied with the required alcohol testing, education, and training for 2009, 2010, and 2011.*

GP has added a summary of qualification requirements for pipeline contractors to its O&M Manual.

Completed.

GP will implement a Pipeline Maintenance Construction Checklist and will train employees responsible for hiring pipeline contractors on the procedures to obtain, review, approve, and retain operator qualification records and drug and alcohol for contractors and subcontractors prior to covered task work.

Due Date: August 31, 2012

- 33.4 49 CFR §199.245 Contractor employees.** *GP failed to ensure that contract employee ("R.L.D."), who completed covered tasks, complied with the required alcohol testing, education, and training during construction of the pipeline in 2010.*

GP has added a summary of qualification requirements for pipeline contractors to its O&M Manual.

Completed.

GP will implement a Pipeline Maintenance Construction Checklist and will train employees responsible for hiring pipeline contractors on the procedures to obtain, review, approve, and retain operator qualification records and drug and alcohol for contractors and subcontractors prior to covered task work.

Due Date: August 31, 2012

SECTION II

AREAS OF CONCERN (AOC)

1. **WAC 480-93-018 Records.** *GP leak survey records lack attention to accuracy/detail.*

GP will complete a self-audit of leak survey record keeping procedures and provide employee leak survey training in procedures and recordkeeping. See Section 1: 7.1, 9.0, 10.0, 12.0, and 13.0.

Due Date: August 31, 2012.

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.*

GP will update its O&M Manual Procedure Section 3.3.9 to state remedial action shall be completed within 90 days.

Due Date: August 31, 2012.

3. **WAC 480-93-180 Plans and procedures.** *GP does not have detailed procedures for the acceptance/review and monitoring of hydrostatic tests.*

GP will update O&M Manual Procedure Section 4.8 to include hydrostatic test review and acceptance procedures as submitted in Attachment 2 of GP's October 21, 2011, letter of intent.

Due Date: August 31, 2012.

4. **WAC 480-93-180 Plans and procedures.** *GP's Public Awareness Plan 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.*

GP will revise the Public Awareness Plan (PAP) Manual Sections to correctly reference Section 2.4, Safety Considerations.

Due Date: August 31, 2012.

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.*

GP will update O&M Manual Procedure 3.2.3 to include the language "property owner or adult occupant."

Due Date: August 31, 2012.

6. **49 CFR §199.3 Definitions.** *GP's definition for "Operator" is incomplete under this regulation.*

GP will correct its definition in the Alcohol Misuse Prevention Plan and Anti-“Drug Plan to read, “Operator means a person who owns or operates pipeline facilities subject to Part 192, 193, or 195 of this chapter”.

Due Date: August 31, 2012.

7. **49 CFR §192.105 Design formula for steel pipe.** *Records show that GP failed to design for its pipeline until after they completed pipeline construction.*

GP commits to ensure ensuring consistency in its procedures, construction, design, and specifications records for future projects. See Section I: 2.0, 3.3, 3.6, 7.6, 14 & 18.

Completed.

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.*

GP shall remove welding procedure JR_SM_P1G from its O&M Manual until GP properly qualifies the new version of the welding procedure, or replaces this procedure with the original qualified procedure updating it to reflect the change in ownership and acceptance of the procedure. Also see AOC #8.

Due Date: August 31, 2012.

9. **49 CFR §192.229 Limitations on welders.** *GP has not consistently re-qualified its own welders without exceeding the regulation mandated 6 calendar month time requirement.*

GP will schedule welder re-qualification well in advance of the mandated 6 calendar month time requirement. GP will elevate the priority of this task within its scheduling system to ensure re-qualification does not exceed the 6 months between qualification tests.

Due Date: August 31, 2012.

10. **49 CFR §199.101 Anti-drug plan.** *GP failed to post its Alcohol Misuse and Anti-drug Plans in the manner identified in the plans. GP states the plans shall be posted, in its entirety, on various work location bulletin boards.*

GP will up-date its Anti-Drug Plan Paragraph III, A, 2, to read, “Employees covered by this plan shall be advised that the plan may be assessed either on the Camas Mill Maintenance Department we page under Natural Gas Pipeline or a hard copy may be

viewed at the clock room office. All covered employees will be provided a complete copy of the anti-drug plan upon request.”

Due Date: August 31, 2012.

11. **49 CFR §199.202 Alcohol misuse plan.** *GP's Alcohol Misuse Prevention Plan JV(A)(l) Alcohol Tests Required- Pre- Employment Plan mimics the regulation.*

GP will update its Alcohol Plan to conduct pre-employment alcohol testing under 49 CFR 199 as identified in GP's Letter of Intent dated October 21, 2011.

Due Date: August 31, 2012.

12. **WAC 480-93-110 Corrosion control.** *Each gas pipeline company must have a written atmospheric corrosion control monitoring program.*

GP will update its O&M Manual Section 3 to include sufficient detail and clear and concise direction for taking corrective action to cure atmospheric corrosion. GP will include remediation timeframes in accordance with the rule.

Due Date: August 31, 2012.