



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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Ref. No. Docket PG-090030

CERTIFIED MAIL

July 7, 2009

Bert A. Valdman
Executive VP & Chief Operating Officer
Puget Sound Energy
PO Box 90868 MS: EST-07W
Bellevue, Washington 98009-0868

Dear Mr. Valdman:

Re: 2009 Standard Natural Gas Inspection of West King County

We conducted a natural gas inspection from April 1, 2009 through June 27, 2009, of Puget Sound Energy's (PSE) West King county distribution system. The inspection included a maintenance records review and inspection of the pipeline facilities.

Our inspection indicates a series of three probable violations, as noted in the enclosed report.

Your response needed

Please review the attached report and respond in writing by August 10, 2009. The response should include how and when you plan to bring the probable violations into full compliance. We also request your response to our area of concern. As we have done in the past, we welcome the opportunity for a meeting to discuss your response to our findings.

What happens after you respond to this letter?

The attached report presents staff's decision on probable violations and does not constitute a finding of violation by the commission at this time.

After you respond in writing to this letter, there are several possible actions the commission, in its discretion, may take with respect to this matter. For example, the commission may:

- Assess an administrative penalty under RCW 81.88.040, or



Puget Sound Energy-West King County
Docket PG-090030
July 7, 2009
Page 2

- Issue a complaint, seeking monetary penalties, changes in the company's, practices, or other relief authorized by law, and justified by the circumstances, or
- Consider the matter resolved without further commission action.

We have not yet decided whether to pursue a complaint or penalty in this matter. Should an administrative law judge decide to pursue a complaint or penalty; your company will have an opportunity to present its position directly to the commissioners.

If you have any questions, or if we may be of any assistance, please contact Scott Rukke at (360) 664-1241. Please refer to docket number PG-090030 in any future correspondence regarding this inspection.

Sincerely,



Anne F. Soiza
Pipeline Safety Director

cc. Mike Hobbs, PSE
Duane Henderson, PSE
Helge Ferchert, PSE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
2009 Standard Natural Gas Pipeline Safety Inspection
Puget Sound Energy-West King County
Docket PG-090030

The following violations of WAC 480-93, and 49 CFR Part 192, were noted as a result of the 2009 pipeline safety inspection of the Puget Sound Energy (PSE) West King County distribution system. The inspection included a review of the records, inventory, and field operations and maintenance of the natural gas facilities.

PROBABLE VIOLATIONS

1. **49 CFR §192.355(b)(1) Customer meters and regulators: Protection from damage**
- (a) *Protection from vacuum or back pressure. If the customer's equipment might create either a vacuum or a back pressure, a device must be installed to protect the system.*
 - (b) *Service regulator vents and relief vents. Service regulator vents and relief vents must terminate outdoors and the outdoor terminal must:*
 - (1) *Be rain and insect resistant;*
 - (2) *Be located at a place where gas from the vent can escape freely into the atmosphere and away from any opening into the building; and,*
 - (3) *Be protected from damage caused by submergence in areas where flooding may occur.*
 - (c) *Pits and vaults. Each pit or vault that houses a customer meter or regulator at a place where vehicular traffic is anticipated must be able to support that traffic.*

Charge:

Regulator relief vents on certain PSE meter sets did not have proper screening installed to prevent debris and insects from entering and plugging the regulator relief.

Finding(s):

Field inspections found the following meter sets with regulator relief vents that did not have proper screening to prevent debris and insects from entering and plugging the regulator relief. A plugged vent could cause an over pressure condition downstream of the meter.

- a) PSE has a meter set located at 153 SW 153rd St, Burien (Meter # 648230). The meter set regulator vent terminates inside a parking garage located under a building intended for human occupancy. The regulator is vented with 3/4-inch steel and does not have a vent screen to prevent debris and insects from entering and plugging the vent.
- b) PSE has a meter set located at 13060 1st Ave S., Burien. Meter # 950320. The meter set regulator vent terminates through a section of 3/4" steel pipe and does not have a vent screen to prevent debris and insects from entering and plugging the vent.

- c) PSE has a meter set located at 780 S. Michigan ST., Georgetown. This is a 3-meter manifold and 2 of the meter numbers are, #399221 and #771271. The meter set regulator vent terminates through a section of 3/4" steel pipe and does not have a vent screen to prevent debris and insects from entering and plugging the vent.

Note: A post field review indicates that these 3 installations have been remediated. Please respond and explain why these were not found during PSE's vent inspection program.

2. **WAC 480-93-188(3)(d) Gas leak surveys**

- (3) *Each gas pipeline company must conduct gas leak surveys according to the following minimum frequencies:*
- (d) *Where the gas system has cast iron, wrought iron, copper, or noncathodically protected steel - at least twice annually, but not to exceed seven and one-half months between surveys;*

Charge:

Copper service lines are not being leak surveyed twice annually.

Finding(s):

PSE's annual report (PHMSA F 7100.1-1) indicates that PSE has 332 copper services in their distribution system. These services are located primarily in the King County area and areas where steam lines were prevalent. PSE was unable to provide any documentation indicating that these copper service lines are being leak surveyed twice annually in accordance with the rule.

3. **WAC 480-93-188(2) Gas leak surveys (instrument calibration)**

- (2) *Each gas pipeline company must maintain, test for accuracy, calibrate and operate gas detection instruments in accordance with the manufacturer's recommendations. If there are no written manufacturer's recommendations or schedules, then the gas pipeline company must test such instruments for accuracy at least monthly, but not to exceed forty-five days between testing, and at least twelve times per year. The gas pipeline company must recalibrate or remove from service any such instrument that does not meet applicable tolerances. Records of accuracy checks, calibration and other maintenance performed must be maintained for five years.*

Charge:

Gas detection instruments were not calibrated monthly.

Finding(s):

Records indicate that the following PSE Gas First Responder leak detection instruments were not calibrated monthly as required.

- a) Gascope 10002 - missed 10/07, 5/08 and 10/08.
b) Gascope 1016 - missed 8/07, 9/07, 10/07 and 12/07.

- c) Gascope 1021 - missed 2/08, 4/08.
- d) Gascope 1039 - missed 1/08, 4/08, 8/08 and 11/08.
- e) Gascope 1041 - missed 11/07, 4/08 and 11/08.
- f) Gascope 1096 - missed 8/07 and 11/07.
- g) Gascope 1508 - missed 3/07, 6/07, 10/07, 2/08, and 4/08 thru 11/08.
- h) Gascope 1711 - missed 11/08.
- i) Gascope 1718 - missed 5/07, 12/07, 5/08 and 7/08.
- j) Gascope 1746 - missed 3/07, and 11/07.
- k) Gascope 2105 - missed 3/07.
- l) Gascope 2285 - missed 7/07, 8/07 and 9/07.
- m) Gascope 2308 - missed 2/08.
- n) Gascope 2326 - missed 2/07 and 12/07.
- o) Gascope 3797 - missed 11/07.
- p) Gascope 3953 - missed 8/07, 12/07, 2/08, 7/08, 9/08 and 12/08.
- q) Gascope 4000 - missed 2/08 and 5 thru 11/08.
- r) Gascope 4618 - missed 9/07, 1/08, 2/08 and 7/08.
- s) Gascope 4730 - missed 8/08 and 10/08.
- t) Gascope 5058 - missed 3/07, 12/07, 10/08 and 12/08.
- u) Gascope 5756 - missed 2/08, 4/08 and 10/08.
- v) Gascope 6089 - missed 11/08.
- w) Gascope 6229 - missed 2/08.
- x) Gascope 639 - missed 3/07, 4/07, 7/07, 8/07, 10/07, 11/07, 12/07, 2/08 and 10/08.
- y) Gascope 6796 - missed 8/07, 12/07, 6/08 and 11/08.
- z) Gascope 6840 - missed 3/07, 8/07, 10/07, 12/07, 2/08, 5/08, 9/08 and 11/08.
- aa) Gascope 8010 - missed 11/08.
- bb) Gastrac 23870 - missed 2/08 and 3/08.
- cc) Gastrac E30669 - missed 9/07, 1/08 and 12/08.
- dd) Gastrac E30691 - missed 3/07, 12/07, 10/08 and 12/08.
- ee) Gastrac E30693 - missed 12/07, 6/08, 10/08 and 12/08.
- ff) Gastrac E30694 - missed 5/07, 12/07, and 7/08.
- gg) Gastrac E30698 - missed 2/08 and 4/08.
- hh) Gastrac J44664 - missed 8/07 and 11/07.
- ii) Gastrac J44681 - missed 1/07, 3/07, 9/07, 1/08, 2/08, 3/08 and 5 thru 11/08.
- jj) Gastrac J44873 - missed 3 thru 12/07, 8/08 and 10/08.
- kk) Gastrac J45470 - missed 11/07 and 11/08.
- ll) Gastrac J45476 - missed 1/07, 2/07, 6 thru 12/07, 2/08 and 6/08.
- mm) Gastrac J45623 - missed 1/07, 2/07, 3/07, 6/07, 10/07 and 10/08.
- nn) Gastrac J45757 - missed 2/08, 4/08 and 10/08.
- oo) Gastrac J49853 - missed 3/07, 8/07, 2/08, 5/08, 9/08 and 11/08.
- pp) Gastrac J50114 - missed 11/08.
- qq) Gastrac J51121 - missed 8/07, 12/07, 7/08, 9/08 and 12/08.
- rr) Gastrac J51124 - 8/07 and 11/07.
- ss) Gastrac J51134 - missed 2/08.
- tt) Gastrac J51135 - missed 5/07, 01/08, 8/08 and 10/08.
- uu) Gastrac J53298 - missed 5/07, 6/07, 8/07, 11/07, 4/08 and 11/08.
- vv) Gastrac J53300 - missed 8/07 and 4/08.

- ww) Gastrac J53307 - missed 1/08.
- xx) Gastrac J53309 - missed 5/07, 6/07, 8/07, 6/08 and 11/08.
- yy) Gastrac J53315 - missed 12/07 and 11/08.
- zz) Gastrac J53316 - missed 12/07, 5/08 and 10/08.
- aaa) Gastrac M02605 - missed 2/08 and 10/08.
- bbb) Gastrac M02607 - missed 1/09.
- ccc) Gastrac M04383 - missed 2/07, 4/07, 5/07, 8/07 and 12/07.
- ddd) Gastrac M04390 - missed 6 thru 12/07, 2/08 and 6 thru 11/08.
- eee) Gastrac M04790 - missed 2/08.
- fff) Gastrac M07380 - missed 11/07, 7/08 and 11/08.
- ggg) Gastrac M09516 - missed 1/07, 6/08 and 10/08.
- hhh) Gastrac M09577 - missed 10/07, 5/08 and 10/08.

Records indicate that the following Potelco leak detection instruments were not calibrated monthly as required:

- a) Gascope 1023 - missed 1/07 and 2/07. (Lost)
- b) Gascope 1240 - missed 2/07. (Lost)
- c) Gascope 2140 - missed 2/07, 3/07 and 4/07. (Lost)
- d) Gascope 5737 - missed 2/07, 3/07 and 4/07. (Lost)
- e) Gascope 6072 - missed 1/07. (Lost)
- f) Gascope 6225 - missed 10/07. (Lost)
- g) Gascope 11377 - missed 10/08.
- h) Gasscopes 14347, 14368, 4433, 8060 and 9993 all missed 11/08.