



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250
(360) 664-1160 • TTY (360) 586-8203

Ref. No. Docket PG-090051

CERTIFIED MAIL

November 16, 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 Inspection for Sumner Propane Gas Distribution, Pierce County

We conducted a propane gas inspection on November 2 and 4, 2009 of Puget Sound Energy's (PSE) Sumner distribution system located in Pierce County. The inspection included a maintenance records review and inspection of the pipeline facilities.

Staff would like to thank Darryl Hong for his assistance in coordinating with PSE staff for the field inspection and his repeated efforts to contact Ferrell Gas. Ferrell Gas was not responsive during our inspection and they are not exempted from having maintenance documentation as identified in this report.

Our inspection indicates five areas of concern items, as noted in the enclosed report.

Your response needed

Please review the attached report and respond in writing by December 18, 2009. The response should include how and when you plan to bring the area of concern items into full compliance. 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 findings and does not constitute a finding of violation by the commission at this time.



Puget Sound Energy-Sumner LP-Gas Pierce County

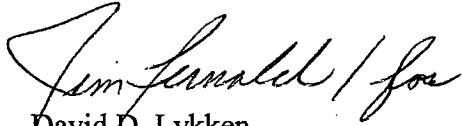
Docket PG-090051

November 16, 2009

Page 2

If you have any questions, or if we may be of any assistance, please contact Lex Vinsel at (360) 664-1319. Please refer to docket number PG-090051 in any future correspondence regarding this inspection.

Sincerely,

A handwritten signature in black ink, appearing to read "David D. Lykken". The signature is written in a cursive style with a large initial "D".

David D. Lykken

Acting Pipeline Safety Director

cc. Mike Hobbs, PSE

Duane Henderson, PSE

Helge Ferchert, PSE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
2009 Standard Propane Gas Pipeline Safety Inspection
Puget Sound Energy-Sumner LP-Gas Pierce County
Docket PG-090051

The following areas of concern of 49 CFR Part 192 and National Fire Protection Association 58 were noted as a result of the 2009 pipeline safety inspection of the Puget Sound Energy (PSE) Sumner propane distribution system. The inspection included a review of the maintenance records and field operations.

AREAS OF CONCERN

1. **49 CFR §192.616 Public Awareness.**

(b) *The operator's program must follow the general program recommendations of API RP 1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.*

Charge:

PSE's public awareness program is not comprehensive.

Finding(s):

During the review of the customer notices, it was discovered that the unique attributes and characteristics of propane were not addressed to protect persons and property from a propane leak.

2. **49 CFR §192.739 Pressure Limiting and Regulating Stations**

(a) *Each pressure limiting station, relief device, and pressure regulating station and its equipment must be subjected at intervals not exceeding 15 months. But at least once each calendar...*

Charge:

Maintenance records of the propane regulator and tank overpressure protection were not available.

Finding(s):

Ferrell Gas is the owner of the 1,000 gallon propane tank, they provide gas regulation for PSE's distribution system, and they provide maintenance for tank relief valve. The records for the distribution regulator and tank overpressure protection were not available from Ferrell Gas.

3. **National Fire Protection Association 58 Liquefied Petroleum Gas Code**

5.7.10.1 Are container openings equipped with one of the following:

(3) *A backflow check valve, plugged.*

Charge:

The fill port on the propane tank was not equipped with a plug/cover.

Finding(s):

During the field inspection, the fill port to the 1,000 gallon tank was not equipped with a plug/cover.

4. **National Fire Protection Association 58 Liquefied Petroleum Gas Code**

5.7.2.4 (a) Are ASME containers for LP-Gas equipped with direct spring-loaded pressure relief valve conforming with applicable requirements of UL 132, Standard on Safety Relief Valves for LP-Gas, or other equivalent pressure relief valve standards?

Charge:

During the record review, PSE did not have any documentation on the tank's relief valve.

Finding(s):

Ferrell Gas is the owner of the 1,000 gallon propane tank and relief valve. PSE did not have any documentation as to the type of relief valve, pressure setting, and valve design.

5. **National Fire Protection Association 58 Liquefied Petroleum Gas Code**

6.10.10 Do all emergency shutoff valves comply with the following? (1) Each emergency shutoff valve shall have at least one clearly identified and easily accessible manually operated remote emergency shutoff device

Charge:

PSE's emergency shutoff valve was not in compliance.

Finding(s):

During the field inspection, PSE's did not have an emergency shutoff valve identified.