

Ref. No. Docket UG-020639

CERTIFIED MAIL

January 28, 2003

Karen Turner Lee
Manager, Safety, Standards and Practices
Puget Sound Energy
PO Box 90868 MS: XRD-LL
Bellevue, Washington 98009-0868

Dear Ms. Turner Lee:

Subject: Puget Sound Energy-Standard Inspection of King County

The Washington Utilities and Transportation Commission (Commission) has the authority to enforce the minimum safety regulations per Chapter 480-93 of the Washington Administrative Code (WAC) pertaining to the construction, maintenance and operation of pipelines transporting natural gas in the state of Washington. In addition, the Commission adopts the Code of Federal Regulations (CFR) Title 49, Part 191 and 192.

Beginning on November 11, 2002 through November 22, 2002, Commission pipeline safety staff (Staff) conducted a pipeline safety inspection of Puget Sound Energy's (PSE) natural gas facilities in King County. Enclosed is Staff's report showing the results of the inspection including three violations of state and federal pipeline safety codes.

It is not to be assumed that this inspection detected all apparent violations. It is incumbent upon Puget Sound Energy to review their operation and determine whether there are other areas of non-compliance.

Please review the attached report and respond in writing by March 3, 2003. The response should include a letter of intent and the date you plan to provide full compliance with each of the items noted in the report.

Puget Sound Energy
Docket UG-020639
January 28, 2003
Page 2

If you have any questions or if Staff may be of any assistance, please contact Joe Subsits at (360) 664-1322.

Thank you for your cooperation and interest in pipeline safety.

Sincerely,

Douglas Kilpatrick, P.E.
Pipeline Safety Director

Enclosure

cc. Sue McLain, PSE
George Pohndorf, PSE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
2002 Natural Gas Pipeline Standard Inspection Report
Puget Sound Energy-King County
Docket UG-020639

NON-COMPLIANCE AREAS

An on-site standard inspection was conducted on November 11 through November 22, 2002. As a result of the inspection, the following non-compliance items were discovered.

1. **§192.747 Valve Maintenance: Distribution Systems**

Title 49, CFR Part 192.747 requires that each valve, the use of which may be necessary for the safe operation of a distribution system, must be checked and serviced at intervals not exceeding 15 months, but at least once each calendar year.

Findings:

A review of the valve inspection records for valve # 253 revealed that the valve had been inspected on June 29, 2001 and then on October 12, 2002. The required inspection frequency was exceeded by two weeks.

Recommendation:

Ensure that valves necessary for the safe operation of the distribution system are checked and serviced at intervals not exceeding 15 months within each calendar year.

2. **§192.743 Pressure Limiting and Regulating Stations: Testing of Relief Devices**

Title 49, CFR Part 192.743 requires that if feasible, relief devices be tested in place at intervals not exceeding 15 months, but at least once each calendar year, to determine that they have enough capacity to limit the pressure on the facilities to which they are connected to the desired maximum pressure.

Findings:

A review of the regulator testing records for regulator station # 35 revealed that the station had been tested on April 27, 2001 and then on August 6, 2002. The required testing frequency at the station had been exceeded by 9 days. Station 35

consist of two stage intermediate and low pressure regulators with two relief valves.

Recommendation:

Ensure that all relief devices are tested at intervals not exceeding 15 months within each calendar year. Review the entire system to ensure other systems are tested within the required testing period.

3. **§192.743 Pressure Limiting and Regulating Stations: Testing of Relief Devices**

Title 49, CFR Part 192.743 requires that if feasible, relief devices be tested in place at intervals not exceeding 15 months, but at least once each calendar year, to determine that they have enough capacity to limit the pressure on the facilities to which they are connected to the desired maximum pressure.

Findings:

A review of regulator testing records for Regulator Station # 1084 showed a 0 lock-up pressure for the regulators at that station. Further inquiry revealed that lock-up test could not be done on the regulators because there are no lock-up ports drilled into the system that would accommodate testing of the relief devices.

Recommendation:

Configure regulator stations to allow for testing. Test regulators at an interval not exceeding 15 months but at least once each calendar year to determine that they have enough capacity to limit pressure on the facilities to which they are connected.