Georgia-Pacific
CONSUMER PRODUCTS (CAMAS) LLC
401 NE Adams Street, Camas, WA 98607
Telephone: (360) 834-3021

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

August 9, 2012

David D. Lykken
Washington Utilities & Transportation Commission
Pipeline Safety Division
1300 S. Evergreen Park Drive SW
P. O. Box 47250
Olympia, WA 98504-7250

Dear Director Lykken:

Pursuant to Docket PG-110017 we are providing you with a copy of our MOC titled "Remote Valve Disabled by Williams Pipeline" for your files. Please see the attachment.

If you have any questions concerning this submission or need additional information, please contact Steve Ringquist at 360-834-8166 or steve.ringquist@gapac.com.

Sincerely,

Gary W. Kaiser
Vice President

GWK/ml

Attachment

cc:
S. Ringquist - GP/Camas
R. Simmons - GP/Atlanta
P. Johnson - WUTC/Olympia
T. O'Conner - GP/Atlanta
C. Trummel - Hunton & Williams/Atlanta
R. Hogfoss - Hunton & Williams/Atlanta

Georgia Pacific - Management Of Change

Title: Remote Valve Disabled by Williams Pipeline Date: 1/23/2012

Initiator: S.C. Ringquist Contact # (360) 834-8166

Title: Reliability Leader Email: steve.ringquist@gapac.com

Authority for Approving Change: Steve Ringquist

Description of Proposed Change (including Reason for Change and Analysis of Implication):

Proposed Change:
Update the Integrity Management Plan section 8.7 to reflect that the remote shut-off valve owned and operated by Williams Pipeline Northwest is out of service. Georgia-Pacific has evaluated this change and determined it will not adversely affect our time to respond to an emergency due to the close proximity of the MERT team responders to the William's metering station located on 'C' Street in Washougal. MERT performed a drill and their response time was 3 minutes and 40 seconds which is rapid and comparable to the time required to contact Williams Pipeline and request their valve be actuated. Thus Georgia-Pacific determined the out of service remote shut-off valve will not adversely affect our ability to respond to an emergency.

Supporting Documents: Updated 8.7 language, Copies of Valve Failure Incident Reports

Required Permits Acquired? None Time to Acquire Permits N/A

Proposed Starting Date: Upon receipt of this MOC Proposed Completion Date: 1/25/2012

Locations Affected: This will effect the entire pipeline.

Communication Plan: Email communication to MERT employees.

Approval from Affected Parties. Respond by: 1/25/2012

Please evaluate the proposed technical or procedural change and evaluate consequence to your department.

	N/A	Approve Change	Reject Proposed Change with Reason
Environmental Leader	N/A		
Utilities Maintenance	N/A		
MERT		K.Goodell	
HR	N/A		
Safety	N/A		
Purchasing	N/A		
Maint. Contractor		R.Rogers	
Reliability Leader		S.Ringquist	

Comments:
Change approved.

Change Completed by: Steve Ringquist Change Completed (Date): 1/25/2012

or occurrences. It considers the likelihood of the threat, the consequence of the potential failure, resource availability and other factors in selecting the means to mitigate the potential hazard.

- Stabilization of the soil
- Stabilization of the pipe or pipe joints
- Relocation or lowering of the pipeline
- Lowering of the pipeline below the frost line
- Providing lightning protection
- Line patrolling
- Monitoring movement progress in areas of ongoing subsidence and slides.

Since the GP pipeline is a new pipeline that was based upon a conservative design, many of these outside forces have been neutralized (i.e. concrete coating and excess depth in the river crossing, pipe is always oriented uphill or down hill – no side slope routing, nominal pipe depth 60 inches vs. 30 per CFR 49 Part 192, import backfill where needed)

8.6 Corrosion

If the GEORGIA PACIFIC becomes aware of a corrosion condition that could affect the integrity of a pipeline on a segment covered by the rule (which the GEORGIA PACIFIC interprets as meaning an immediate repair corrosion condition), it will establish a schedule for evaluating all pipeline segments (both covered and non-covered) with similar material coating and environmental characteristics (i.e., CP, CP interference, age of construction), and makes remediation as necessary.

For corrosion defects that fall into the scheduled response and monitored corrosion severity groups, the GEORGIA PACIFIC follows the guidelines of GRI-00/0230, Determining Periodic Inspection Intervals for High Consequence Areas, for predicting growth rates of the defects so that they do not reach a critical level before the next inspection.

8.7 Automatic Shutoff Valves or Remote Control Valves

Georgia Pacific will consider installing remote actuation on valves if operating conditions determine that such valves should be installed. Remote control valves were evaluated when the pipeline was designed in 1992. The geotechnical stability of the pipeline right of way coupled with the robust river crossing design resulted in a consensus decision with GP and the WUTC that there were no conditions that warranted remote control valves.

There is a remote actuated valve at the Williams gate station which is owned and operated by Williams Pipeline NW and installed specifically for the service to the GP pipeline. This RCV is currently out of service due to two instances of the valve failing to the closed position. GP has evaluated how the lack of availability of the RCV could affect response time in an emergency. The mill emergency response team (MERT) performed a drill and determined their time to respond the Williams gate station is 3 minutes and 40 seconds. This is a rapid response time and it is comparable to the time it would take GP to contact Williams NW and request the valve be closed (if it was operable). GP has determined that the lack of this RCV has not noticeably changed our ability to isolate the line in an emergency.