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April 2, 2004

Carole J. Washburn, Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Attn: ~~Alan Rathbun~~

Subject: Puget Sound Energy – 2003 Standard Inspections for King, Pierce, and Kittitas Counties

Dear Mr. Rathbun:

This letter is in response to a letter from the Washington Utilities and Transportation Commission (WUTC) dated March 2, 2004 regarding Dockets PG-030080, PG-030128 and PG-030129. The following information addresses the items of possible non-compliance as well as the areas of concern discussed in the letter.

1. 49 CFR 192.13 General

(c) Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.

Response

PSE disagrees with findings A and B under Item 1. These requirements are included in PSE's Gas Operating Standards manual but are not "required to [be established] under this part". Nevertheless, we have provided detailed responses as noted below.

PSE is also concerned about Staff's choice of citing PSE for failure to comply with 192.13 under individual audit items. This appears to be duplicative and punitive because PSE's O&M manuals include the plans, procedures, and programs required to be established under Part 192 and therefore any potential non-compliance with a particular rule will naturally be a possible non-compliance with our O&M manual.

Finding A – King County

PSE's operations and maintenance manual (O&M) section 2600.1200 5.2 states, "Test leads shall be terminated only in a CP test box." At the time of PSE's 2003 inspection of Vashon Island, where two 8-inch, 250 psig pipelines transport natural gas from Vashon Island under the water to Gig Harbor, the test leads had not terminated in a CP test box in accordance with PSE's O&M manual.

Response

PSE considers this a unique situation because the test lead termination is located on a PSE easement that is not accessible to the public and is therefore not a safety concern. Furthermore, PSE's standard is neither an engineering requirement nor a code requirement. It is, rather, a company best practice that was implemented to eliminate test lead terminations in valve boxes where the wires may interfere with valve operations. PSE plans to revise Operating Standard 2600.1200 to allow greater flexibility for test lead terminations where the installation of test lead boxes is not practical.

Finding B – Pierce County

PSE's O&M manual section 2450.1600 states, "*Calibration checks and calibration of instruments shall be performed according to the schedules listed in this standard.*" Staff found table 1 indicates that digital thermometer/pyrometers are calibrated semi-annually, not to exceed 7.5 months between inspections. The following is a list of missed calibration dates on the PSE Quality Assurance Inspectors records. PSE has not calibrated pyrometers in accordance with PSE's O&M manual.

- Pyrometer with serial number FLU-7018068 was calibrated 7/2001, 2/2003, and 11/2003.
- Pyrometer with serial number FLU-5930186 was last calibrated 1/2002.
- Pyrometer with serial number ATK-970533434 was calibrated 5/2002 and 11/2003.
- Pyrometer with serial number FLU-6983029 was calibrated 9/2002 and 8/2003.
- Pyrometer with serial number ATK-08734449075 was calibrated 3/2002 and 10/2003.
- Pyrometer with serial number FLU-4355192 was calibrated 3/2002 and 12/2002.
- Pyrometer with serial number FLU-4355130 was calibrated 3/2002 and 4/2003.

Response

PSE identified and resolved a data entry problem in which calibration data was not being consistently transferred to the Calibration Database. After researching the issue PSE's Test, Repair, and Calibration department provided the following updated documentation that demonstrates these instruments were in fact calibrated in accordance with PSE's Operating Standard at the time of the inspection.

- Pyrometer with serial number FLU-7018068 was calibrated 7/2002, 2/2003, 6/2003 and 11/2003.
- Pyrometer with serial number FLU-5930186 was calibrated 1/2002, 7/2002, 1/2003, 7/2003 and 1/2004.
- Pyrometer with serial number ATK-970533434 was calibrated 5/2002, 11/2002, 6/2003 and 1/2004.
- Pyrometer with serial number FLU-6983029 was calibrated 6/2002, 9/2002, 2/2003, 8/2003 and 11/2003.
- Pyrometer with serial number ATK-08734449075 was calibrated 1/2002, 3/2002, 9/2002, 1/2003, 5/2003, 10/2003 and 2/2004.

- Pyrometer with serial number FLU-4355192 was calibrated 3/2002, 7/2002, 12/2002, 3/2003, 8/2003 and 1/2004.
- Pyrometer with serial number FLU-4355130 was calibrated 3/2002, 9/2002, 4/2003, 10/2003 and 3/2004.

2. 49 CFR 192.465 External Corrosion Control: Monitoring

Finding A – Pierce County

At the time of the 2003 inspection, Staff found that test sites at the following locations were not tested at least once each calendar year, not exceeding intervals of 15-months.

- Test site 42511 (5912 98 St. SW Lakegrove)
- Test site 42512 (109 St SW & Bridgeport Way SW)
- Test site 42513 (S 126 St & Park Ave)
- Test site 42510 (Gravelly Lake Dr SW & 98 St SW)
- Test site 45043 (5325 193 Ave Ct E), and
- The whole system that includes test sites 47501, 47503, 47505, 47507, 47509, 47511, 47513, 47515, 47519.

Response

The above listed test sites ranged from 6 days to 1.5 months past due (none of these test sites have a history of past due inspections). Considering that Staff completed a very thorough review of the 9853 test sites in Pierce County by examining approximately 90% of the records, and that the results of this inspection revealed only 14 test sites which went past due (less than 1% of the total test site population), PSE is confident our existing inspection process is sound. PSE will, however, strive for continuous improvements to the inspection process.

Finding B – Pierce County

At the time of PSE's 2003 inspection, Staff found that the test site located at 701 E Main Ave, Puyallup, was not cathodically protected and was not monitored in a 10-year interval.

Response

At the time of inspection 701 E Main Ave, Puyallup was adequately cathodically protected as evidenced by a PSP reading of 1.6 mV. In addition, PSE has added this location to the 10-year monitoring interval (TS-48804).

In response to previous findings regarding isolated services (UG-011273), PSE implemented a company wide plat review to identify possible isolated steel risers and steel wrapped services not covered through the critical bond program. The map review phase of the project is complete and the field review of the identified potential isolated services is underway. In 2004, PSE expects to complete the field review of one quarter of the potential locations and will use 2004 as a test year to determine how to efficiently budget the remaining locations.

3. 49 CFR 192.481 Atmospheric Corrosion Control: Monitoring

Finding – Pierce County

At the time of PSE's 2003 inspection, Staff found that there was heavy atmospheric corrosion on the natural gas riser located at 10715 62nd St E, Puyallup in the Goldenrose Mobile Park, Space 81B. PSE did not provide documentation that the atmospheric corrosion had been evaluated on this pipeline facility exposed to the atmosphere.

Response

In PSE's 2003 Gas Operating Standards manual, effective March 3, 2003, PSE implemented a new policy requiring inactive service risers without meters in mobile home or travel trailer parks to be cut and capped at the main. As PSE works through the current 3-year patrolling cycle for trailer parks, these risers will be identified and subsequently cut and capped. In addition, PSE continues to strive for improvements in the atmospheric corrosion monitoring and remediation process.

The above listed riser was cut and capped on April 2, 2004, and the Goldenrose Mobile Park patrol will be completed by April 30, 2004.

Part 192.13

In addition, Staff also found that PSE failed to comply with its O&M manual Section 2600.1800 4.1 which states, *"Each pipeline exposed to the atmosphere including service risers, meter sets, piping at district regulators, propane tank farms and CNG injection sites, shall be re-evaluated for atmospheric corrosion at intervals not exceeding 3 years."*

4. 49 CFR 193.483 Remedial Measures: General

Finding – Pierce County

At the time of PSE's 2003 inspection, Staff randomly selected 19 corrosion leak reports to review in order to ensure cathodic protection, such as anodes, were installed. Staff found that PSE's records showed that 10 of the 19 locations did not have anodes installed. The following are those found that did not have anodes installed:

- L9504387, 2406 Rosemont Pl W, University Place
- L9404765, 8522 N Thorne Ln SW, Tillicum (2-inch steel wrapped pipe – no anode required)
- L9503847, 423 S 50 St, Tacoma
- L9603049, 10501 Gravelly Lake Dr SW, Lakewood
- L9901046, 423 S 50 St, Lakewood
- M0000401, 6151 Steilacoom Blvd SW, University Place
- M0000603, 4128 Beechwood Dr W
- M0100302, 13002 Lake City Blvd SW
- M0102474, 5043 S Washington St
- M0102557, 4518 S Washington St

Response

With the exception of L9404765 and L9603049, PSE will remediate these locations by August 31, 2004. Leak L9404765 was on 2-inch steel wrapped cathodically protected pipe and no anode was required. The location of the L9603049 repair is in the middle of a heavily traveled road, making further excavation at the repair site difficult and disruptive to local traffic flows. Instead of additional localized remediation, PSE has scheduled this particular main for replacement in 2005.

To prevent this situation from recurring, PSE has implemented the following measures:

1. Created a job aide to serve as checklist when performing corrosion leak repair on unprotected bare steel pipelines;
2. Since January 2004, PSE is auditing 100% of the leak repair records. This level of audit will continue until PSE is satisfied that the problem is corrected.
3. Distributed a written reminder to the Service Provider regarding documentation of anode installation; and
4. The Service Provider will implement a QC program specific to corrosion repairs.

Part 192.13

In addition, Staff also found at the above locations, that PSE failed to comply with its O&M manual Section 2600.1900 6.4.2, which states, "*Bare steel pipe segments repaired as a result of external corrosion shall be protected with a galvanic anode.*"

5. 49 CFR 192.605 Procedural Manual for Operations, Maintenance, and Emergencies

Finding – King County

At the time PSE's 2003 inspection, PSE's O&M manual section 2625.1400 "Patrolling" did not include written procedures for patrolling the two 8-inch, 250-psig pipelines in the navigable water between Des Moines and Vashon Island, and between Vashon Island and Gig Harbor.

Response

PSE disagrees with Staff's findings. PSE's Gas Operating Standard 2625.1400, "Patrolling Program and Continuing Surveillance", fully complies with the patrolling requirements set forth in CFR 192.705 and 192.721. PSE believes that the existing pipeline safety rules for patrolling apply to onshore buried and exposed pipelines and not submerged pipelines. PSE conducts patrols of the 8-inch Vashon Crossing pipelines up to and including the shoreline, and annually performs a shut-in test to check for leakage on the submerged portions of these pipelines. A specific procedure for patrolling the submerged portion of the pipelines is not required under 49 CFR Part 192.

PSE's position is supported by the language in 192.705, "Transmission lines: patrolling". Namely, that patrol programs are required "*to observe surface conditions on and adjacent*

to the transmission line right-of-way for indications of leaks, construction activity, and other factors affecting safety and operation.” Although the same explanation for the purpose of patrolling is missing from the language found in 192.721, “Distribution systems: patrolling”, it is reasonable to assume that the patrolling requirements for both distribution and transmission are intended to serve the same objective, which clearly applies to onshore buried and exposed pipelines. This position is also supported by the guide material found in “Guide for Gas Transmission and Distribution Piping Systems” (GPTC), a technical publication issued by ANSI.

Until 1991, CFR Part 192 contained no regulations on inspections for underwater pipelines. Then, section 192.612 was introduced but is limited to pipelines in the Gulf of Mexico. On December 12, 2003, RSPA/DOT issued a notice of proposed rulemaking for periodic inspections of underwater pipelines (RSPA-97-3001). This proposal would expand the existing rule to require operators of gas pipelines to have procedures for periodic inspections of pipeline facilities in offshore waters less than 15 feet deep or crossing under a navigable waterway.

6. 49 CFR 192.747 Valve Maintenance: Distribution Systems

Finding – Pierce County

At the time of the 2003 inspection, Staff’s records review of PSE’s designed emergency valves revealed that PSE valve inspection VA-1670, VA-6078, VA-6772, VA-2130, VA-5129, VA-5273, VA-5316, VA-5358, VA-5375, VA-5376, VA-5393, VA-5397, VA-5603, VA-5605, VA-5606 and VA-2097 had not been completed in the required time frames.

Response

PSE inspects a total of 661 valves in Pierce County annually. Each of the above listed valves ranged from 10 days to 4 months past the inspection due date. In many instances there are reasons why inspections go past due, such as when a valve is paved over or a vehicle is parked over the valve at the time of the inspection. When these conflicts arise, they are normally documented in the work order, however the valves in question did not include such descriptions. PSE will continue to make improvements to the documentation process for valve inspections to ensure that reasons for inspection delays are properly recorded in the inspection records.

Part 192.13

In addition, Staff also found that PSE failed to comply with its O&M manual section 2575.1200 4.1.

7. WAC 480-93-110 Corrosion Control

Finding – Pierce County

At the time of PSE's 2003 inspection, Staff found that the following locations were not cathodically protected.

- 900 Meridian Ave E #2, Milton
- 11105 Valley Ave E #1, Puyallup
- 134 Washington Ave S, Orting (134 Train St SE, Orting)
- 12825 Pacific Hwy SW, Lakewood
- 445 E Main Ave, Puyallup
- 1119 Main St, Sumner (Lutz Title)
- 1114 Valley Ave #29, Puyallup (5702 112 Ave Ct E #29, Puyallup)
- 201 Calistoga Ave W (201 Corrin Ave NW) Meter #74602
- 5616 113 Ave E, Puyallup

Response

The cathodic protection issue at each address listed above was immediately resolved at the time of Staff's inspection. Furthermore, PSE has two programs in place to identify isolated locations that require cathodic protection (Critical Bond & Plat Review). These locations would have been captured by one of these programs.

8. WAC 480-93-110 Corrosion Control

Finding – Pierce County

At the time of PSE's 2003 inspection, Staff found that cathodic protection remedial action was not completed within 90-days on PSE work order numbers F442304, F437973, F437975, F440777, F440776, F450853, F411204, F411949, F450370, F456947, F433320, F434031, F421999, and F423294.

Response

Prior to the audit, PSE recognized the need for process improvements related to the timely completion of cathodic protection remediation work orders. PSE met with our Service Provider last summer and subsequently implemented process changes and improved communications to minimize overdue remediations.

Part 192.13

In addition, Staff also found that PSE, for the above referenced work order numbers, failed to comply with its O&M manual Section 2600.1900 5.1.1 which states, "*Remedial action shall be completed within 90 days to correct any cathodic protection deficiencies know and indicated by the company's records.*"

9. WAC 480-93-115 Casing of Pipelines

Finding – Pierce County

At the time of PSE's 2003 inspection, Staff's record review indicated that PSE had not conducted leak tests in the appropriate ninety-day timeframe at the following test sites.

- Test site 31425, Pacific Ave & S 99th – 12/24/2002 and 3/27/2003 (3 days past due)
- Test site 31431, River Rd & 4th St NW – 6/21/2002 and 9/26/2002 (5 days past due) - 12/24/2002 and 3/31/2003 (7 days past due)
- Test site 31869, Portland Ave E & E 18th – 12/24/2002 and 3/28/2003 (4 days past due)
- Test site 31884, S 56th St and NPRR – 2/24/2002 and 3/28/2003 (13 months past due)
- Test site 35029, E 17th St & Thorne Rd – 12/24/2002 and 3/28/2003 (4 days past due)
- Test site 35659, E. E St & E 26th St – 12/24/2002 and 3/28/2003 (4 days past due)

Response

With the exception of test site 31884, the above listed sites were 3 to 7 days overdue for leak survey. Historically PSE has not had any problems meeting the 90-day leak survey schedule for the approximately 45 sites on the list. The overdue sites in question were the direct result of a single incident of miscommunication between PSE and its leak survey contractor.

Concerning test site 31884 (13 months past due) PSE identified the cause of this isolated issue as a data entry error. PSE has limited the accessibility of this particular database to ensure this does not occur in the future.

Part 192.13

In addition, Staff also found, that PSE failed to comply with its O&M manual Section 2600.1900 5.1.3 which states, *"Whenever a short exists between a pipeline and its casing, the conditions shall be evaluated with 90 days to determine whether a hazardous condition exists. Thereafter, leak test shall be conducted on a 90 day schedule until the condition is corrected."*

10. WAC 480-93-188 Gas Leak Survey

Finding – Pierce County

At the time of the 2003 inspection, Staff found 14 missed calibration dates on Pilchuck's (PSE's contractor) Instrument Calibration Data form. PSE has not calibrated gas scopes as follows:

- Gas scope with serial number 1007 was calibrated on 11/8/2002, the next calibration date was 3/11/2003. (3 days past due)
- Gas scope with serial number 1024 was calibrated on 6/17/2002, the next calibration date was 11/18/2002. (1 month past due)

- Gas scope with serial number 1038 was calibrated on 5/13/2002, the next calibration date was 9/23/2002. (10 days past due)
- Gas scope with serial number 1150 was calibrated on 5/3/2003, the next calibration date was 9/23/2002. (20 days past due)
- Gas scope with serial number 1150 was calibrated on 9/23/2002, the next calibration date was 3/19/2003. (2 months past due)
- Gas scope with serial number 1150 was calibrated on 3/19/2003, the next calibration date was 8/14/2003. (25 days past due)
- Gas scope with serial number 1220 was calibrated on 1/9/2002, the next calibration date was 5/20/2002. (11 days past due)
- Gas scope with serial number 1220 was calibrated on 11/26/2002, the next calibration date was 4/16/2003. (20 days past due)
- Gas scope with serial number 1230 was calibrated on 5/22/2001, the next calibration date was 1/18/2002. (4 months past due)
- Gas scope with serial number 1230 was calibrated on 1/18/2002, the next calibration date was 4/22/2002. (OK)
- Gas scope with serial number 1230 was calibrated on 4/22/2002, the next calibration date was 8/27/2002. (5 days past due)
- Gas scope with serial number 1230 was calibrated on 8/27/2002, the next calibration date was 11/18/2002. (OK)
- Gas scope with serial number 1230 was calibrated on 11/18/2002, the next calibration date was 4/7/2003. (20 days past due)
- Gas scope with serial number 1230 was calibrated on 4/7/2003, the next calibration date was 8/11/2003. (4 days past due)

Response

PSE is working with our Service Provider to develop a more effective system to manage calibration. These changes will be implemented as soon as possible, but no later than April 30, 2004.

Part 192.13

In addition, Staff also found for the above locations and dates, that PSE failed to comply with its O&M manual Section 2450.1600, which states, "*Calibration checks and calibration of instruments shall be performed according to the schedules listed in this standard.*" Table 1 indicates that Gas Scopes (MSA 60-natural gas) are calibrated four times a year not to exceed four months.

11. WAC 480-93-188 Gas Leak Survey

Finding- Pierce County

At the time of the 2003 inspection, Staff found that PSE did not have pressure test records for the following high-pressure services located in Sumner at:

- 1716 210 Ave E
- 1605 210 Ave E

- 19911 12th St E
- 19918 12th St E

Response

These services were installed in 1989, in accordance with PSE Operating Standards. PSE's standards at that time did not include the requirement of recording pressure test results for services. This requirement was added in 1993 as a result of a review of WAC requirements.

Furthermore, these services were retired and replaced by a 2" PE main extension in 2003 as part of the Bonney Lake uprate.

12. WAC 480-93-18601 Table 1-Leak Classification and Action Criteria

Finding A – King County

At the time of the 2003 inspection, Staff found that PSE's August 2003 Leak Report indicated that PSE had two class 2 leaks that had not been reevaluated, repaired, or cleared.

Response

In August of 2003 PSE had a total of 430 leaks company-wide due for reevaluation or repair. The 2 leaks that went past due represent less than 1% of the total leaks due for reevaluation or repair. PSE's excellent leakage action program consistently provides results that meet or exceed this level of compliance.

Finding B – Pierce County

At the time of the 2003 inspection, Staff found that PSE's 2003 Overdue Leak Report indicated numerous class 2 and 3 leaks that had not been repaired or cleared.

Response

PSE would like to clarify that Staff's findings pertain to repaired or cleared dates that went past due versus not completed at all. In 2003, PSE consistently averaged less than 1% past due leak evaluations or repairs while eliminating over 400 leaks.

Part 192.13

In addition, Staff also found that PSE failed to comply with its O&M manual Section 2625.1300 4 *Gas Leak Classification and Action Criteria*, which states in section 2625.1300 4.2.2.1 "*Repair Priority – Grade B leaks should be repaired or cleared in one year but shall not exceed 15 months from the date reported.*"...and also in Section 2625.1300 4.2.3.1 "*Repair Priority – Grade C leaks should be reevaluated during the next scheduled survey, or within the 15 months of the last evaluation, whichever occurs first, until the leak is repaired or no longer results in a reading.*"

Other Areas of Concern

1. Staff observed several Fisher regulators with the vents in a horizontal position. Fisher regulator states that vents should always be pointed in the downward position so as not to accumulated water or moisture, which could affect the regulator operation. An example of Staff's observation would be the regulator found at meter number 339451.

Response

PSE believes the mis-aligned Fisher S202 regulator vent found at meter number 339451 is an isolated occurrence. It is and has been PSE's practice that if the vent cannot be installed in the downward position, then a gooseneck would be added to prevent the potential of water getting into the regulator.

The other horizontal regulator vents that the Staff refers to were on Fisher 99 regulators. These were installed in accordance with the manufacturers approved recommendation and no remediation is required. Prior to 1994, Fisher 99 regulators were manufactured with the option for the vent to be installed in the horizontal position if the breather hole in the closing cap was closed and the 1/4" plug was removed and 1/4" vent pipe was installed in place of the plug. PSE has installed many Fisher 99 regulators following this approved manufacturers method.

2. PSE should indicate a repair timeframe for atmospheric corrosion remedial action. Staff reviewed records indicating that remedial action was required but over a year elapsed between the inspection and the repair. Examples of the inspections where an extended period of time occurred between the inspection and repair are as follows:
 - 2103 31st Ave SE, Puyallup. Inspected 3/26/2002 and repaired 6/4/2003.
 - 7308 114th St Ct E, Puyallup. Inspected 3/25/2002 and repaired 6/5/2003.
 - 10319 13th St Ct E, Edgewood. Inspected 10/31/2002, no repair information as of this inspection.
 - 675 Elm-Tree Lane, Fircrest. Inspected 8/15/2002, no repair information as of this inspection.
 - 3325 77th Ave NW, Gig Harbor. Inspected 10/3/2002, no repair information as of this inspection.

Response

PSE continues to strive for improvements in the atmospheric corrosion monitoring and remediation process. In establishing a repair time frame for atmospheric corrosion remediation, PSE favors a risk-based approach (see response to #3 below).

3. PSE personnel indicated that some valves were not accessible while conducting bridge patrols. As of the date of this inspection, these valves were not made accessible. An example would be the valve at the Valley Ave and Highway 410 bridge in Sumner, Plat 248079. PSE's O&M manual procedure 2625.1400 Section 5.2.1.3 requires that valves on bridge crossings be checked for accessibility during regular patrols. The patrol conducted on December 3, 2002, indicated that the valve

was not accessible. As of the date of this inspection, the valve is still not accessible or operable due to being paved over. PSE should add remedial action timeframes for items identified during patrols as requiring follow up action.

Response

Potential remediation issues that arise during patrolling activities undergo an engineering review and are prioritized using risk-based methodology. Applying remedial action time frames for items identified during patrols would limit PSE's ability to assign resources to higher risk projects in order to comply with a remediation requirement for a lower risk item.

4. PSE's O&M manual requires that mobile home surveys be conducted every three years. PSE just met the survey frequencies and should rewrite the timeframe to allow a grace period, otherwise they risk being in violation of Part 192.13.

Response

The following is an excerpt from Section 7.1.1 of PSE Gas Operating Standard 2625.1400, "Patrolling Manufactured/Mobile Home and Recreational Vehicle Communities":

"All mains and services located within a manufactured/mobile home or recreational vehicle community shall be patrolled every 3 years at intervals not to exceed 39 months."

PSE feels this timeframe allows for an adequate grace period to complete the surveys.

5. Office of Pipeline Safety interpretation 192.555 – 5, dated May 31, 2001, requires that a previous pressure test be used to substantiate any new MAOP obtained by uprating. If a previous pressure test for the affected segment of pipeline would not substantiate the new proposed MAOP, then a pressure test must be conducted in conjunction with the uprate. This limitation is not stated in PSE's procedure 2575.2500 and should be added.

Response

In PSE's 2004 Gas Operating Standard Manual, effective March 1, 2004, the following statement was added to Operating Standard 2575.2500, "Uprating and Downrating Pipelines":

"Any pipeline segment with a test pressure that does not substantiate the new MAOP (refer to Section 6.1.4 of the Operating Standard) shall be re-tested in accordance with Operating Standards 2525.3300, "Testing Requirements" and 2525.1400."

6. PSE indicated that the patrolling of the two 8-inch 250-psig pipelines running under the water in Puget Sound from Des Moines to Vashon Island, and from Vashon Island to Gig Harbor had been discontinued. To prevent failure or leakage of the pipelines and the consequent hazards to public safety caused by damage to the pipelines from

boat anchors or other hazards, PSE should begin patrolling the two 8-inch 250-psig pipelines.

Response

Please see PSE's response to item 5, "49 CFR 192.605 Procedural Manual for Operations, Maintenance, and Emergencies" in the previous section of this response letter.

PSE appreciates the opportunity to work cooperatively with Staff to ensure public safety. If you have any additional questions, please feel free to call me at (425) 462-3957.

Sincerely,



Jim Hogan
Manager, Standards & Compliance

Cc: Greg Zeller
Booga Gilbertson
Sue McLain
Kimberly Harris
Lorna Luebbe
Kaaren Daugherty