



PUGET
SOUND
ENERGY

July 29, 2004

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

Attn: Joe Subsits, Pipeline Safety Engineer

Re: Request for information regarding the June 21, 2004 incident

Dear Mr. Subsits:

As you know, Pilchuck Contractors, a PSE service provider, was working on a gas main replacement project in the Magnolia district of Seattle when the incident in question occurred. It was a Pilchuck employee who was injured.

PSE service providers are independent contractors who perform various kinds of work for PSE under long - term agreements. While PSE expects them to perform this work in accordance with our standards and procedures, the responsibility for managing their job sites and insuring employee safety lies with them. For this reason, we have asked Pilchuck to address the majority of the questions and requests posed in your June 24, 2004 letter. A copy of their response to questions 1 through 10 and 12 through 14 is attached.

Two requests, numbers 11 and 15, are directed to PSE specifically.

Request 11: Describe and submit results of previous QA / QC inspections performed by PSE on this crew.

Response: In 2004, there have been eleven gas site audits and thirty gas special project inspections conducted under the name of Frank Near, the crew leader on the day of the incident. The injured employee was specifically named seven times as a member of Mr. Near's crew. The gas site audit results showed that there were 76% satisfactory ratings while the gas special project inspections recorded a 100% satisfactory rating. Copies of those audits / inspections conducted by our Quality Assurance & Inspection staff are enclosed.

Request 15: Please submit PSE recommendations resulting from the incident evaluation.

Response: There are no formal recommendations. However, several actions have been taken.

PSE's Gas First Response organization has committed to review the incident at group safety meetings. They will discuss the specific details of the incident, reinforce the need to follow standards and procedures, and review the proper use of personal protective equipment in gaseous atmospheres.

Our Contract Management department has received a copy of Pilchuck Contractors' accident investigation and has confirmed that Pilchuck's safety staff reviewed the elements of this incident with all of their employees during safety meetings.

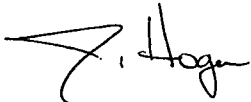
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July 29, 2004
Washington Utilities and Transportation Commission
Page 2

PSE's Safety and Operations Training department also reviewed the incident and confirmed that our expectations of prompt notification to us of such incidents were met.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Hogan". The signature is stylized with a large initial "J" and a cursive "Hogan".

Jim Hogan
Manager, Standards and Compliance

encl.

cc: G. Zeller
B. Gilbertson
S. McLain
H. Shapiro
D. Lamothe



PILCHCI101MA

11711 NORTHCREEK PARKWAY S SUITE D103 • BOTHELL, WA 98011
P.O. BOX 808 • BOTHELL, WA 98041-0808
(425) 485-7908 / FAX (425) 485-3418
www.pilchuckci.com

1. **Work plan for the project that was being carried out.**
The overall scope of work is to install 3500' of 6" PE within the Magnolia 35th Ave. W area. This crew's project was working on the 2" tie in for the new 6" PE main. The 2" PE was extended 150' down W. Smith St. to 35th Ave. W.
2. **Identify the crew working on the project. Also identify the crew leader.**
Foreman/ Welder Frank Near
Welder Mike Johnson
3. **Identify the specific procedures that were to be followed in the project.**
Procedures to be followed are found in the "2004 PSE Gas Operating Standards part 2525.3400"
4. **If applicable, describe the procedures that were not followed by the crew.**
 1. The valve on the tee was not shut down, allowing gas to vent.
 2. The test head had been removed and the purge riser had not been installed.
 3. The worker jumping in the hole did not ground the pipe before going in; this allowed a static charge to spark.
 4. Worker and Foreman did not communicate procedures prior to removing squeezers or the problem of blowing gas after removing the squeezer.
5. **Identify the specifications for the existing and new pipe that was used in this project.**
Both existing and new pipe were; DriscoPlex 6500 PE 2406. DriscoPlex pipe and fittings are manufactured from PE 2406 medium density polyethylene compound that is classified according to ASTM D 3350, Standard Specification for Polyethylene Plastics Pipe and fittings Materials. The cell classification number for Performance Pipe PE 2406 is 234363E.
6. **Submit any drug and alcohol testing resulting from the incident.**
Pilchuck administered testing as outlined in the Anti-Drug & Alcohol Misuse Prevention Plan under U.S. Department of Transportation Research and Special Programs Administration. Results were negative for both workers involved.
7. **Describe any required training for personnel performing project tasks.**
All workers are required to pass an OQ test specific to their job description. They have union affiliations and the training associated with their expectations. Further Pilchuck has ongoing training sessions for any job specific requirements.
8. **Describe the training received by the crew.**
As described above, both Frank and Mike had previously passed OQ training for their Job tasks. In addition, on 6/23/04 after the incident both received and passed an OQ retest relating to the written covered task summary under CTS 1418, "Purging" and CTS 2011, "Prevention of Accidental Ignition"

9. Describe any certifications and qualifications of the crew including level of experience.
Each individual has been certified by PSE to work on their system, and have passed OQ exams for each required task. Both Mike and Frank worked for PSE until February of 2001 when they came to work for Pilchuck Contractors Inc. They have worked continuously for Pilchuck since.

10. Please describe the number of hours this crew has worked the past two weeks.
For the week of June 7, thru June 13, 2004 the crew worked a total of 40hrs with 2hrs of overtime with the exception of the foreman who had 2 additional hrs of overtime to complete his paper work.

For the week of June 14, thru June 20, 2004 the crew worked a total of 40hrs with 2hrs of overtime with the exception of the foreman who had 2 additional hrs of overtime to complete his paper work.

11. Describe and submit results of previous QA/QC inspections performed by PSE on this crew.

(This question will be directed first to PSE's QA&I department for a response)

12. Describe the events leading up to, during and after the incident.

The crew was working on the 2" tie in for the new 6" PE main. The 2" PE was extended 150' down Smith St. to 35th.

The 2" PE main was tested and ready to purge. A set of 2" PE squeezers was installed at the connection tie-over from the feed to the west. A second set was installed at the connection tie-over from the feed to the North. A 5/8" svc tee was also installed at the purge point downstream with a riser to be installed.

At about 10am the job Foreman walked up the hill to lift the 2" PE squeezers. The Foreman asked the fitter at the purge hole to install the 5/8" purge riser. The job Foreman assumed the tee was stopped off.

It was open with about 1' of pipe extending from the fitting. The job Foreman lifted the squeezers allowing gas to escape from the fitting. The Fitter at the purge hole heard the gas escaping before the purge riser had been installed. The fitter jumped into the hole to run the tap down causing a static ignition.

The fitter got back out of the hole and instructed the Foreman to put the 2" PE squeezers back down and that he had got burned. The gas was shut off immediately and the fire extinguished.

911 were notified and transported the fitter to Harborview medical center for treatment.

13. Describe how the system and tools were grounded.

At the location of the incident, the system had not yet been grounded. In the typical application soapy burlap would be used to ground the pipe.

14. Describe what could have prevented this incident from happening.

Better communication between the crew members to make sure that proper grounding procedures and purging equipment was in place prior to removing the squeezers and releasing the gas into the pipe.

15. Please submit PSE recommendations resulting from the incident evaluation.
(PSE will develop this response)