



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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Ref. No. Docket PL-091410

CERTIFIED MAIL

December 11, 2009

Alan J. Cabodi, President
McChord Pipeline Company
3001 Marshall Avenue
Tacoma, Washington 98421

Dear Mr. Cabodi:

RE: Integrity Management Field Inspection

We are in receipt of the McChord Pipeline (McChord) response dated 9/28/2009 to a field inspection conducted on August 5-11, 2009. During the inspection, two probable violations and one area of concern were identified. The following is staff's follow-up response to your reply:

Item #1 49 CFR §195.402 Procedural manual for operations, maintenance and emergencies.

Your response informed the commission that McChord is in full compliance with ASME B31.4, WAC 480-75-430 and 49 CFR §195.402 requirements while performing maintenance activity on your pipeline using a natural gas company's welding procedure.

49 CFR §195.402 requires McChord to have a manual for conducting maintenance activities including welding procedures (49 CFR §195.214) that are qualified under Section 5 of API 1104 or Section IX of the ASME Boiler and Pressure Vessel Code. The quality of the test welds used to qualify the welding procedure shall be determined by destructive testing. A record of the qualifying tests shall be retained by the operator.

Please provide to the commission a copy of the destructive testing results used to qualify the procedure used for performing field welds on August 5-11, 2009.

In addition, the welding procedure in question was used by the contractor without the expressed written authorization of Puget Sound Energy (PSE). McChord will need to keep on file for future inspections, all correspondence from third parties approving the use of their welding procedures on the McChord pipeline system.



Item #2 49 CFR §195.505 Qualification Program

McChord must verify that covered task employees and contractors have current qualifications prior to performing maintenance activities. We are in receipt of the updated NDT certificate from the QA Manager for the radiography technician in question.

Item #3 49 CFR §195.250 Clearance between pipe and underground structures

Your response was to assure the commission that the McChord cathodic protection (CP) system is adequate in protecting your pipeline where it crosses over a concrete coated 52-inch steel water main with 2-inches of clearance. The response identified the concrete coating and a fiberglass reinforced plastic sheet placed between the two pipelines as insulators and noted close interval surveys to monitor adequacy of CP. We are concerned that:

- The water main is a larger metallic mass shielding your 6-inch diameter pipeline from CP current.
- The concrete coating found on your pipeline and on the water main is not an insulator. CP is used to protect rebar in concrete piers in a salt water environment.
- It may not be practical to perform a satisfactory close interval survey over pavement at the intersection of 72nd and Waller Road.

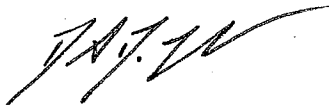
Was the in-line-inspection tool rescheduled to complete the inspection and establish a baseline for future monitoring the adequacy of your CP system including the new section of pipe placed over the water main? At what frequency in the future will your pipeline be inspected with a smart pig tool? Was there any indication of internal or external corrosion found on the pipe section removed?

Your response needed

Please respond in writing by January 12, 2010 to Items #1 and #3, above. Refer to this docket number PL-091410 in your correspondence.

If you have any questions, or if we may be of any assistance, please contact Al Jones at (360) 664-1321.

Sincerely,



David D. Lykken
Acting Pipeline Safety Director

cc: Corey Herrick, McChord Pipeline