

**Woodard, Marina (UTC)**

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**From:** Busko, Kristen [Kristen.Busko@avistacorp.com]  
**Sent:** Monday, December 20, 2010 12:52 PM  
**To:** Woodard, Marina (UTC)  
**Cc:** Cox, Bryan; Faulkenberry, Mike; Chandler, Randy; Moreau, Joyce; Douglas, Gary  
**Subject:** Avista response to PG-100049  
**Attachments:** 2010 WUTC AVA Response Spokane Ritzville.pdf.

Hi,

Attached please find Avista's response to the Spokane/Ritzville audit, docket PG-100049.

Happy holidays!

<<2010 WUTC AVA Response Spokane Ritzville.pdf>>

**Kris Busko, P.E.**  
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RECEIVED *via email*  
DEC 20 2010  
WUTC  
Pipeline Safety Division





Submitted via e-mail

December 17, 2010

Mr. David Lykken  
Pipeline Safety Director  
Washington Utilities and Transportation Commission  
1300 S Evergreen Park Dr. SW  
PO Box 47250  
Olympia, WA. 98504-7250

RECEIVED

DEC 20 2010

WUTC  
Pipeline Safety Division

**Re: Docket PG-100049, 2010 Natural Gas Standard Inspection – Spokane/Ritzville, Washington**

Dear Mr. Lykken,

In response to the Washington Utilities and Transportation Commission ("Commission") natural gas inspection of Avista Utilities' ("Avista") facilities in Spokane and Ritzville, Washington, conducted between September 13<sup>th</sup> and October 22<sup>nd</sup>, 2010. On November 17, 2010, Commission staff sent Avista an inspection report ("Inspection Report"). The Inspection Report includes 2 probable violations of natural gas safety regulations. Specifically, the Inspection Report indicates that:

1. Avista was in violation of 49 CFR §192.455, External corrosion control: Buried or submerged pipelines installed after July 31, 1971;
2. Avista was in violation of 49 CFR §192.507, Test requirements for pipelines to operate at a hoop stress less than 30 percent of SMYS and at or above 100 psig.

1. **Charge: Avista is in violation of 49 CFR §192.455, External corrosion control: Buried or submerged pipelines installed after July 31, 1971;**

Avista's acting Chief Gas Engineer and General Foreman of cathodic protection met with the UTC pipeline safety staff on October 28<sup>th</sup>, 2010, to review Avista's improvements to their cathodic protection program and to discuss Avista's plan going forward to find additional isolated steel pipe segments. At this meeting, Avista discussed implementing a special cathodic protection (CP) program for the purpose of finding, as practicable, all isolated steel in Avista's natural gas piping systems. The method for finding the isolated steel will be by full-interrupted current surveys. This test method will enable Avista personnel the opportunity to record both "on" and "instant off" pipe-to-soil (p/s) voltage potential readings on the pipe in all cathodic protection zones in Avista's gas systems in Washington. Isolated steel pipe segments found will be documented and monitored as permitted by §192.465(a). The program will begin in 2011 and we currently expect to be completed by the end of 2013. After we gain some understanding of the actual work involved with this

project, Avista will reevaluate this completion timeframe in January of 2012 and update UTC pipeline safety staff of the expected completion date.

As it is Avista's intent to continue to remove isolated risers from its system rather than to continuously inspect and maintain them, Capital work for riser replacements and isolated steel pipe remediation will continue for up to 10 years until all risers are removed and all isolated steel is removed, tied in with steel pipe, or permanently bonded into the system.

**2. Charge: Avista is in violation of 49 CFR §192.507, Test requirements for pipelines to operate at a hoop stress less than 30 percent of SMYS and at or above 100 psig.**

Avista agrees that we have not followed the procedure outlined in our O&M manual, section 3.18, Pressure Testing. In response to this finding, Avista has revised their pressure test documentation to include a check-box for "high pressure leak check performed" to assure that the existing procedure is followed and documented. Additionally, Avista will conduct emphasis training on this practice prior to the 2011 construction season with all personnel who are responsible for testing high pressure pipelines. The training for Washington state personnel will be completed no later than March 31, 2011.

During the inspection, five areas of concern were also noted in the Commission's report. Specifically, the Commission is concerned with:

1. Avista failed to correctly identify the length of pipe used for a repair rather than the length of the pipeline that was leak tested;
2. Avista did not initially perform a leak survey in 2010 for 3 locations with newly installed or rerouted pipelines;
3. Avista incorrectly cited a portion of 49 CFR within their O&M manual;
4. Avista had meters with a WWP tag; and
5. Avista had some polyethylene pipe stored in its Ritzville yard that was nearing the limit for ultraviolet exposure per WAC 480-93-178.

**1. Avista failed to correctly identify the length of pipe used for a repair rather than the length of the pipeline that was leak tested.**

Avista agrees that instances were found where the length of the entire pipeline section was noted rather than just the length of pipe used for the repair. Avista will perform

emphasis training with personnel responsible for such tests before the 2011 construction season begins.

2. **Avista did not initially perform a leak survey in 2010 for 3 locations with newly installed or rerouted pipelines.**

Fortunately, due to this being found during the audit, Avista was able to perform leak surveys within the 15-month timeframe since the previous survey. Avista is reviewing the process by which mapping updates occur in order to prevent these omissions from happening in the future.

3. **Avista has incorrectly cited a portion of 49 CFR within their O&M manual.**

Avista agrees that we incorrectly cited §192.619(a)(1)(ii) within the 2010 edition of our O&M Manual, section 4.15. Avista has corrected this error for the year 2011, citing §192.619(a)(2)(ii).

4. **Avista had meters with the WWP tag.**

Avista has, since its name change in 1999, revised meter tags through dedicated relabeling efforts and also as planned meter change outs occur. Unfortunately, we have discovered that some tags have disbonded from the meter bodies due to our harsher climate. Avista continues to replace WWP tags wherever found.

5. **Avista had some polyethylene pipe stored in its Ritzville yard that was nearing the limit for ultraviolet exposure per WAC 480-93-178.**

Avista has disposed of the pipe in question and has reviewed the requirement for exposed pipe storage.

Avista appreciates the opportunity to provide this response to the Inspection Report. If you have any questions in regard to Avista's response, please contact Jody Morehouse at (509) 495-2760 or Kris Busko at (509) 495-8767.

Respectfully yours,



Don Kopczynski  
Vice President – Operations  
Avista Utilities

cc: File  
Bryan Cox  
Kris Busko  
David Meyer

Mike Faulkenberry  
Randy Chandler  
Linda Gervais

Jody Morehouse  
Gary Douglas