

Woodard, Marina (UTC)

From: Imad, Antoinette M -Toni <antoinette.imad@pse.com>
Sent: Tuesday, February 07, 2012 2:56 PM
To: Lykken, David (UTC)
Cc: Woodard, Marina (UTC); McGrath, Cheryl; Subsits, Joe (UTC); Gas Compliance -- mail --
Subject: RE: PG-110029 | 2011 Standard Natural Gas Inspection of Pierce County
Attachments: PG110029 PSE Response - Pierce County Inspection.pdf

Dear Mr. Lykken,

Pursuant to your request, PSE is hereby submitting a response to address findings noted in the 2011 Pierce County inspection report dated January 5 , 2012.

Best Regards,

Toni Imad

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February 6, 2012

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

Dear Mr. Lykken:

RE: 2011 Standard Natural gas Inspection – Pierce County. Docket PG-110042

PSE has received and reviewed your letter dated January 5, 2012 regarding the “2011 Standard Natural Gas Inspection of Pierce County” and pursuant to your request is submitting the following written response, including actions taken to address the noted findings.

PROBABLE VIOLATION

1. WAC 480-93-180 Plans and procedures.

(1) Each gas pipeline company must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the gas pipeline company’s system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR §§ 191, 192 and chapter 480-93 WAC, and any plans or procedures used by a gas pipeline company’s associated contractors.

(3) The manual must be written in detail sufficient for a person with adequate training to perform the tasks described. For example, a manual should contain specific detailed, step-by-step instructions on how to maintain a regulator or rectifier, conduct a leak survey or conduct a pressure test.

Finding(s):

In 2010, PSE adopted a new Atmospheric Corrosion Inspection Procedure. PSE’s Operations and Maintenance Manual did not reflect the modifications.

PSE Response:

Standard requirements for monitoring facilities for atmospheric corrosion are outlined in PSE’s Gas Operating Standard 2600.1800 *Monitoring Facilities for Atmospheric Corrosion*. In addition, PSE’s step by step procedure for monitoring atmospheric corrosion is described in Gas Field Procedure 4515.1220 *Monitoring Atmospheric Corrosion*. Although a new Field Procedure was not adopted in 2010, the network of

administrative processes that were used to implement this procedure were revised when PSE contracted Heath Consultants to provide atmospheric corrosion monitoring for residential and small commercial services. At that time, the new processes that were established and implemented for recording the results of the monitoring activity were not documented.

Following the inspection and to help eliminate the concern raised in this finding, the administrative process currently in place has been documented. Furthermore PSE is currently evaluating this process to better reflect record keeping that aligns with GOS 2600.1800 section 7.2, specifically for records of rating 1. PSE will complete this evaluation and report to Staff the results of that evaluation by March 31st 2012.

In addition, and in its effort of continuous process improvement PSE will also perform a thorough review of the Heath process and evaluate the alternative of recording field findings using handheld electronic recording devices. PSE will complete this review and report to Staff the results of that review by June 30th 2012.

PSE trusts that the information provided fully responds to and satisfies your request. PSE respects the Commission's responsibilities in auditing and enforcing pipeline safety regulations and we continue our efforts to construct, operate and maintain a safe gas pipeline system that meets high standards of excellence.

Sincerely,



Sue McLain
Senior Vice-President Delivery Operations

Cc: Carol Wallace, Director Gas Operations
Jennifer Tada, Director Planning
Cathy Koch, Director Compliance
Harry Shapiro, Contractor Management
Cheryl McGrath, Manager Compliance and Regulatory Audits- Gas
Beth Rogers, Manager Contractor Management
Shamish Patel, Manager Standards