



December 15, 2011

Submitted electronically to [mwoodard@utc.wa.gov](mailto:mwoodard@utc.wa.gov)

Mr. David Lykken  
Pipeline Safety Director  
1300 S. Evergreen Park Drive S.W.  
PO Box 47250  
Olympia, WA 98504-7250

Re: Response to WUTC letter dated 11/16/11; Goldendale District Inspection

Dear Mr. Lykken:

In the Washington UTC 2011 Natural Gas Pipeline Safety Inspection Letter (Docket PG-110045) dated November 16, 2011, there were two probable violations noted. The description of the probable violations and Avista's responses are as follows:

1. **WAC 480-93-018 (5) Records.** Each gas pipeline company must update its records within six months of when it completes any construction activity and make such records available to appropriate company operations personnel.

**Finding(s):**

Avista did not update system maps within 6 months of the end of construction. During review of construction records, staff found one case out of thirteen where company maps were not updated within the 6 month time period.

**Avista Response:**

Avista acknowledges that one of the thirteen construction records reviewed for mapping (921 Malinda Street, Goldendale) was not mapped within the required six month period. In response, Avista has implemented improved mapping and editing processes to ensure compliance with the WAC. Accountabilities for these new processes will be reinforced with district personnel.

With regard to this particular mapping deficiency in Goldendale, once the error was brought to Avista's attention by commission staff, it was expeditiously located out and mapping was completed before the end of that business day.

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2. **WAC 480-93-187 (12) Gas Leak Records.** Gas leak records must contain, at a minimum, the following information: Magnitude and location of CGI readings left;...”

**Finding(s):**

Avista did not grade the leak properly by using a Combustible Gas Indicator (CGI) to determine percent Lower Explosive Limit. During review of gas leak records service, personnel on 9/9/2011 did not correctly grade the leak with a CGI, but listed a reading of 10,000 ppm at the leaking gas valve.

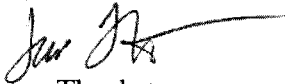
**Avista Response:**

Avista acknowledges that a leak found by an Avista contract leak inspector (Leak Survey Report No. 11-0530) was not properly surveyed with a CGI to determine the magnitude and location of the leak. Avista's Gas Standards Manual and Gas Emergency and Service Handbook require that the magnitude and location of the leak be pinpointed.

A review was conducted not only of the contract employee's leak survey paperwork, but also similar leaks found in Washington during this leak survey cycle. The individual originally performing the survey received further instruction regarding proper documentation and disposition of identified leaks. Additionally, the Contractor's Supervisor revisited all similar non-repaired leaks to properly perform the required CGI survey. Enhanced review procedures have been implemented within the leak survey structure, including periodic review of contractor work practices to ensure they are consistent with Avista standards.

The leak identified in report 11-0530 was repaired on 9/28/11.

Respectfully submitted,



Jason Thackston  
Vice President, Energy Delivery

JT/rkb

CC: Randy Chandler, Spokane Operations Manager  
Mike Faulkenberry, Chief Gas Engineer  
John Schwendener, Gas Delivery Director  
Gas Compliance Commission Correspondence File