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October 19, 2015

Alan Rathbun
Pipeline Safety Director
Washington Utilities and Transportation Commission
Pipeline Safety Section
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RECEIVED
OCT 16 2015
State of Washington
UTC
Pipeline Safety Program

Dear Mr. Rathbun:

RE: 2015 Natural Gas Standard Inspection- Puget Sound Energy – King County West (Insp. No 6177)

PSE has received and reviewed your letter dated September 17, 2015 regarding the 2015 West King County Audit, and pursuant to your request is submitting the following written response to the four probable violations and one area of concern:

PROBABLE VIOLATIONS

1. **49 CFR §192.481 Atmospheric corrosion control: Monitoring**
(a) *Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:*

<i>If the pipeline is located:</i>	<i>Then the frequency of inspection is:</i>
Onshore	At least once every 3 calendar years, but with intervals not exceeding 39 months

Finding(s):

The pipeline inside the bridge at 145th and I-5 in Seattle is contained in a joint utility vault, running the length of the bridge and is exposed to the atmosphere, but no records were available at the time of inspection indicating that an atmospheric corrosion evaluation was being conducted.

PSE Response:

On October 8, 2015, PSE Responded to the location at 145th and I-5 in Seattle, accessed the piping in the joint utility vault, and performed atmospheric corrosion monitoring. The condition of the coating was found to be very good, and no corrosion was found.

PSE is investigating why certain locations have not been inspected for atmospheric corrosion, and the root cause will be addressed. PSE has also initiated an internal review to identify any similar locations. A schedule will be created for visiting each identified location. Beginning in November, each identified location will be visited and inspections for atmospheric corrosion will be performed. Completed inspections will be entered into PSE's SAP database, and will drive the regularly scheduled follow up inspections. PSE will provide quarterly updates to the WUTC on the schedule and status of this project.

2. **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 C.F.R. §§ 191, 192 and chapter 480-93 WAC, and any plans or procedures used by a gas pipeline company's associated contractors.*

2500.0500 section 3.8 of PSE's Gas Operating Standards (GOS) states:

"If it is believed that there are inaccuracies with gas plat or operation maps, a Natural Gas Map Revision Request Form (Form 3666) should be submitted to the Maps, Records and Technology Department for research and updates."

Finding(s):

Several leak survey maps did not show services that PSE had original map records for, but the services were not on the maps that were used during the leak survey to locate the services that were scheduled to be evaluated.

The leak survey contractor had updated several maps with changes to reflect the existence of the service(s), but the maps used for the inspection in the following years did not have the updates incorporated.

Plat map #182073 for years 2014 and 2015 had revisions for 1 gas service.
Plat map #202074 for years 2013 and 2014 had revisions for 1 gas service.
Plat map #190071 for years 2013 and 2014 had revisions for 3 gas services.

PSE's service provider did not follow established procedures to update the maps used to conduct the leak surveys in a timely manner to ensure the scope of the survey was adequate. Form 3666 was used by the service provider, but the changes were not submitted to the appropriate (sic) for research and updates.

PSE Response:

In March of 2015, PSE discovered that the established process for map revisions was not being fully implemented by our leak survey Service Provider. PSE opened up an internal Corrective Action Report (CAR 2015-11) to address this issue. PSE worked with our Service Provider to modify, document, and implement some changes to the process. Map revision requests are now sent to our Maps and Records department directly from field survey personnel. In August of 2015, PSE verified that the new process is working. The Maps and Records department is now receiving periodic update requests directly from the field.

In addition to this, PSE collected approximately 1698 map revision requests that had previously been created by the Service Provider and not submitted to Maps and Records. These were subsequently submitted: Maps and Records has already completed 223 of the revisions, and is on track to complete the remaining 1475 updates by March 31, 2016.

PSE will also make any necessary updates to the three plat maps identified during the audit (182073, 202074, and 190071) by November 30, 2015.

3.

WAC 480-93-188 Gas leak surveys

- (2) *Each gas pipeline company must maintain, test for accuracy, calibrate and operate gas detection instruments in accordance with the manufacturer's recommendations. If there are no written manufacturer's recommendations or schedules, then the gas pipeline company must test such instruments for accuracy at least monthly, but not to exceed forty-five days between testing, and at least twelve times per year. The gas pipeline company must recalibrate or remove from service any such instrument that does not meet applicable tolerances. Records of accuracy checks, calibration and other maintenance performed must be maintained for five years.*

Finding(s):

Flame Ionization (FI) equipment used for leak surveys did not have accuracy check records at least monthly, not exceeding 45 days between testing, and at least 12 times per year for 2014. These FI equipment numbers were #1016 and #10644.

PSE Response:

In 2014, PSE conducted an audit of our leak survey Service Provider's accuracy check and calibration records for leakage detection instruments. PSE discovered that the Service Provider was performing routine accuracy checks and calibrations, but there were gaps in the records, and they were not able to demonstrate full compliance with the requirements. As a result, PSE opened an internal Corrective Action Report (CAR 201505-NT). As part of this CAR, the Service Provider created a written calibration plan. The Service Provider is now implementing the plan and documenting the required accuracy checks and calibrations.

4. **WAC 480-93-188 Gas leak surveys**

- (5) *Each gas pipeline company must keep leak survey records for a minimum of five years. At a minimum, survey records must contain the following information:*
- (a) *Description of the system and area surveyed (including maps and leak survey logs);*
 - (b) *Survey results;*
 - (c) *Survey method;*
 - (d) *Name of the person who performed the survey;*
 - (e) *Survey dates; and*
 - (f) *Instrument tracking or identification number.*

Finding(s):

PSE leak surveyed after a ground fault event at 17071 12th Ave NW in Shoreline 1/3/15, but was unable to provide leak survey record documentation. The only record available was a GPS coordinate log from the special leak survey.

PSE Response:

Beginning in August 2015, PSE assembled a team of stakeholders to evaluate the process being used for special leak surveys that are initiated during emergency events. The team identified several areas for improvement, and has mapped a preliminary improved process for these special leak surveys. These process improvements include ensuring responsibility is designated for returning the leak survey records to the Maintenance Programs department. The team will work with stakeholders to approve, document, and communicate the updated process by 12/31/15.

AREA OF CONCERN

1. **WAC 480-93-110 Corrosion control**

- (2) *Each gas pipeline company must complete remedial action within ninety days to correct any cathodic protection deficiencies known and indicated by any test, survey, or inspection. An additional thirty days may be allowed for remedial action if due to circumstances beyond the gas pipeline company's control the company cannot complete remedial action within ninety days. Each gas pipeline company must be able to provide documentation to the commission indicating that remedial action was started in a timely manner and that all efforts were made to complete remedial action within ninety days. (Examples of circumstances allowing each gas pipeline company to exceed the ninety-day time frame include right of way permitting issues, availability of repair materials, or unusually long investigation or repair requirements).*

Finding(s):

During the field portion of the inspection, we obtained a low reading of -510mV (on) at Belmont and Bellevue Pl. in Seattle, WA. If uncorrected within 90 days, this condition could lead to a probable violation.

PSE Response:

The low read was noted by the inspector on 7/21/15. On 7/22/15 PSE promptly responded, creating a work order notification, and on 7/24/15 PSE began troubleshooting the low read. PSE discovered two different areas with disbonded wires. On 10/7/15, PSE was able to repair a bond at the location of 717 Belmont Ave E. On 10/8/15, PSE was able to repair a bond over an insulated flange on Denny Way. PSP reads were subsequently taken at the test location of Belmont and Bellevue Place in Seattle, and reads were found to be acceptable at -1398mV. In accordance with PSE's Gas Operating Standard 2600.1900, remedial action for this site was completed within the required 90 day timeframe.

We hope the information provided is responsive to the findings of the UTC inspection. PSE is committed to constructing, operating, and maintaining a safe gas pipeline system.

Sincerely,



Booga K. Gilbertson
Vice President, Operations

Cc: Cara Peterman, Director Compliance
Cheryl McGrath, Manager Compliance Programs
Cathy Koch, Director Planning
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