



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

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Sent Via Email and Electronic Return Receipt Mail

October 3, 2017

Gerald Maret
President
BP Pipelines (North America) Inc.
US Pipelines & Logistics
M.C. 9S
30 S Wacker Drive
Chicago, IL 60606

**RE: 2017 Natural Gas Integrity Management Program Inspection – Ferndale Pipeline System
(Insp. No. 7235)**

Dear Mr. Maret:

Staff from the Washington Utilities and Transportation Commission (staff) conducted an Integrity Management Program inspection from August 21-23, of the BP Pipelines (North America) Inc., Ferndale Pipeline System. The inspection consisted of a records review of the integrity management program.

Our inspection indicates one area of concern as noted in the enclosed report, which unless corrected, could potentially lead to future violation of state and/or federal pipeline safety rules.

Please review the attached report and acknowledge receipt in writing by November 6. If you amend your procedures in line with staff's enclosed recommendation, please describe the update in that letter.

If you have any questions or if we may be of any assistance, please contact Dennis Ritter at (360) 664-1159. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

Sean C. Mayo
Pipeline Safety Director

Enclosure

cc: Jim Bruen, DOT Team Leader-Program

UTILITIES AND TRANSPORTATION COMMISSION
2017 Natural Gas Integrity Management Program Inspection
BP Pipelines (North America)—Ferndale Pipeline System

The following area of concern of Title 49 CFR Part 192 605 were noted as a result of the 2017 Integrity Management Program inspection of the Ferndale Pipeline System. To show compliance with the requirements of Subpart O (Title 49 CFR Part 192), a random selection of records is reviewed, including operation and maintenance (O&M) records.

AREA OF CONCERN

1. **49 CFR §192.605 Procedural manual for operations, maintenance, and emergencies**

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.

Finding(s):

The following question was asked during the inspection to see how BP-NA uses valve maintenance data in their integrity management program.

M&O Gas Pipeline Maintenance

Question 11--Do records indicate proper inspection and partial operation of transmission line valves that may be required during an emergency as required and prompt remedial actions taken if necessary? (MO.GM.VALVEINSPECT.R)

Maintenance records for BP-NA are kept electronically in the Maximo work order system. The form used for valve maintenance, VLVB1156 Mainline Block Valve Inspection, is completed in Maximo. There are a series of questions which the technician must fill out, "Y", "N", or "NA". The last 4 questions on the form are as follows:

240 <-- Enter 1 if valve operates (opens/closes) adequately; Enter 2 if valve needs repair.

Long Description:

460 Have you performed the applicable prescribed steps above?

Long Description:

490 Is "Yes" or "N/A" the answer to all the (Y/N/NA) questions above?

Long Description:

495 If No, place an N in the observation box on that specific line.

What was found during a random inspection of valve maintenance work order records was that the technicians were inconsistent in filling out the form after question 240. Question 240 was always filled out correctly (typically with a "1" indicating the valve was operating adequately). However, for the three remaining questions, 460, 490 and 495, the answers were not consistent. Either they were filled in "NA" after answering question 240 with a "1"; or "Y" for 460 followed by "NA" for the remaining; or "Y" for 240, 460 and 490.

BP-NA's procedures manual, *OMER Book 1, P-192.745 Inspection of Mainline Valves*, does not contain instructions for filling out the form, nor is it specific about which questions must be answered. The Maximo work order system allows the technician to enter "NA" even though "Y" or "N" should be the required response. Work orders are approved by a scheduler and the maintenance supervisor. The approval process is inconsistent and lacks validation oversight by the scheduler and maintenance supervisor.

The concern is some of the data used by the IM program for risk determination comes from this database. If inconsistent data is input, then questionable data output to the IM risk model could occur. This inspection did not find evidence of questionable data output. However, we are concerned that there is the potential for questionable data output to occur.

Recommendation:

We suggest BP-NA develop instructions for the maintenance forms and train the technicians or change the Maximo work order system to not allow "NA". In addition, the planner and management supervisor need training on recognizing invalid responses to the questions.