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Pipeline Safety Program

U.S. Pipelines and Logistics

BP Pipelines (North America) Inc.
30 S. Wacker Drive, 10th Floor
Chicago, Illinois 60606

November 6, 2017

VIA EMAIL AND FEDERAL EXPRESS

Sean C. Mayo
Pipeline Safety Director
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S.W.
Olympia, WA 98504-7250

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

Dear Mr. Mayo:

We received the October 3, 2017 Washington Utilities and Transportation Commission ("WUTC") letter, which noted an area of concern identified during an August 21-23, 2017 inspection of the Ferndale Pipeline System operated by BP Pipelines (North America) Inc. ("BP"). The inspection consisted of a records review of the integrity management program.

WUTC's area of concern, finding and recommendation which were set forth in the October 3 letter are restated below in italics and are followed by BP's response.

Area of Concern WUTC Identified

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.*

Findings(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 action 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, VLVB 1156 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 "NA" 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 remaining questions, 460, 490, 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 the 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 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.

BP Response:

All mainline block valve inspections on the Ferndale Pipeline System are documented on Maximo job plan VLVB 1156, *Mainline Block Valve Inspection*. As WUTC noted, all job plan VLVB 1156 documentation that was reviewed during WUTC Inspection No. 7235 confirmed that valves were found to be functioning properly (question 240). Questions 240, 460, 490 and 495 of job plan VLVB 1156 are currently designated as "mandatory" fields that require answers. All other questions on job plan VLVB 1156 are considered "non-mandatory," and detail is provided as needed for these questions for information only.

Work is currently underway to update job plan VLVB 1156 by removing Questions 460, 490 and 495. It will now be mandatory for field personnel to provide individual answers to questions 90 through 240 only. Deleting these three questions will clarify job plan VLVB1156, and no additional instructions will be needed for OMER *Book 1, P-192.745 Inspection of Mainline Valves*. This updated functionality in job plan VLVB 1156 will be implemented by December 31, 2017.

Additionally, as the WUTC recommended, training is currently being developed to educate the Ferndale Pipeline System field personnel, scheduler and operations and maintenance team leader on the revised job plan VLVB 1156 and refresh personnel on acceptable answer options, with a focus on the limited use of the "NA" answer and the specific scenarios in which an "NA" response is acceptable. Finalization and delivery of this training is targeted for December 31, 2017.

BP looks forward to continuing to work cooperatively with WUTC Staff to resolve any concerns. Please contact me at 331-702-4292 if you wish to discuss any of this information further.

Sincerely,



David O. Barnes, P. E.
Compliance Manager
BP Pipelines (North America) Inc.

cc: Gerald Maret