



Puget Sound Energy
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pse.com

August 11, 2022

Sean Mayo
Pipeline Safety Director
Washington Utilities and Transportation Commission
Pipeline Safety Section
621 Woodland Square Loop S.E.
Lacey, WA 98503

RE: 2022 Natural Gas Standard Inspection – Puget Sound Energy East King Unit – (Insp. No. 8449)

Dear Mr. Mayo:

PSE received and reviewed your letter dated July 11, 2022 regarding the 2022 East King County audit. Pursuant to your request, the following is PSE's response to one probable violation.

Probable Violation

49 CFR §192.807 Recordkeeping

Each operator shall maintain records that demonstrate compliance with this subpart.

(a) Qualification records shall include:

- (1) Identification of qualified individual(s);*
- (2) Identification of the covered tasks the individual is qualified to perform;*
- (3) Date(s) of current qualification; and*
- (4) Qualification method(s).*

(b) Records supporting an individual's current qualification shall be maintained while the individual is performing the covered task. Records of prior qualification and records of individuals no longer performing covered tasks shall be retained for a period of five year.

Finding(s):

PSE's field personnel met the inspector at King County Solid Waste Treatment Facility on Monster Rd on June 14, 2022 to perform an odorant sniff test. The inspector checked the operator's qualifications for odorant testing and the task was not on the list of his qualifications within the InstantCard OQ system. Other qualifications, such as valve operation and maintenance were documented and were current.

Upon further investigation by PSE staff, the records were not located for that task in the OQ database. PSE did have some informational records about the individual being signed up for a qualification course and presented those later during the inspection, but no completed test or record for qualification was provided.



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PSE Response:

During the East King field inspection of odorant test sites on June 14, 2022, PSE was unable to find records supporting qualification of the technician who was performing the odorant testing. Field supervisors and Operational Training immediately halted work by this technician and scheduled him for re-evaluation. Training was completed and OQ records were updated on June 17, 2022.

PSE already has a robust system of maintaining operator qualification records including a comprehensive annual review process verifying all Operator Qualified individuals meet core job title responsibilities. There is also an OQ dashboard tool that can be used to verify qualifications for individuals and teams at PSE in real time.

PSE conducted a Root Cause Analysis (RCA) of the OQ records issue and created a corrective action plan to improve existing processes. The RCA focused on optional qualifications which fall outside of core job title tasks. For example, odorant testing is an optional qualification for which only select Customer Field Service Technicians are trained. The corrective action plan includes the following steps:

1. PSE will develop a business process for verifying new, optional qualifications. This process will be documented and implemented by December 1, 2022.
2. PSE will update the business process which is used to schedule odorant checks to include verification using the OQ dashboard tool. This document will be updated by September 1, 2022.
3. PSE will initiate a recurring Gas Operations quality assessment of the periodic odorant testing process. This assessment procedure will be drafted by December 1, 2022, with assessment planned for 2023.

We trust 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,

DocuSigned by:

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Dan Koch

Vice President, Operations

Cc: Troy Hutson, Director Compliance
Kaaren Daugherty, Director Gas Real Time Operations
Zakaria Mohamed, Manager Compliance and Quality Management
Harry Shapiro, Director Gas Operations