



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

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Sent Via email and Electronic Return Receipt Mail

December 27, 2017

Mr. Zach Barrett
Director, State Programs
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
3700 South MacArthur Boulevard, Suite B
Oklahoma City, Oklahoma 73179-7612

RE: Response to 2017 Program Audit Findings

Dear Mr. Barrett:

On December 12, 2017, the Washington Utilities and Transportation Commission (WUTC) Pipeline Safety Program received a report pertaining to the annual evaluation of the program, performed by Mr. Michael Thompson of the Pipeline and Hazardous Materials Safety Administration.

The audit was conducted September 18-25, 2017, with the purpose of ensuring compliance with the Pipeline Safety Act's requirement for state pipeline safety programs. We appreciate the opportunity to provide additional information related to the two issues identified in the audit.

Below are the WUTC's responses:

1. *After review of the WUTC procedures for reportable incidents, it appears clarifying language would be helpful for engineers on call to respond to reportable incidents, regarding the appropriate time to contact the Chief Engineer for both State and Federally reportable incidents.*

WUTC staff has amended procedures to add clarifying language in accordance with guidance supplied by Mr. Thompson during the evaluation.

2. *During the evaluation, PHMSA discussed the results of the State Inspection Calculation Tool (SICT) for the WUTC with Mr. Mayo. The SICT indicates the WUTC will need to complete 478 inspection days for the gas program in 2017. The SICT indicates 63 days for the hazardous liquids program will be required to be completed for 2017. The WUTC needs to continue to monitor its inspection efforts and evaluate necessary actions to more*

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Zach Barrett, Director, State Programs
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accurately estimate the number of inspection days required for the WUTC inspection program.

WUTC staff is committed to continued evaluation and refinement of our target goals for inspection days. With Mr. Thompson's assistance, we have identified potential variances between estimated and actual inspection days and believe this will lead to more accurate data in 2018. While the program has vastly outperformed original estimates in recent years, we are committed to refining these estimates in the SICT.

We thank you and Mr. Thompson for your professionalism and courtesy throughout the audit process.

If you have any questions about these comments or other pipeline safety matters, please contact me directly at (360) 664-1208 or Sean Mayo, Director of Pipeline Safety, at (360) 664-1219 or smayo@utc.wa.gov.

Sincerely,



David W. Danner
Chairman

cc: Michael Thompson, PHMSA PHP-50
Dustin Hubbard, Western Region Director, PHMSA PHP-500
Sean C. Mayo, Director, UTC Pipeline Safety Program
Pat Hazzard, Director, UTC Safety and Consumer Protection