



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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January 7, 2008

Tom Finch
State Liaison, Western Region
PHMSA, Office of Pipeline Safety
12300 W. Dakota Avenue, Suite 110
Lakewood, Colorado 80228

Dear Mr. Finch:

Subject: CY 2006 Program Certification Audit

Thank you for your letter dated December 14, 2007, describing the results of the evaluation of the Utilities and Transportation Commission (UTC) Pipeline Safety program.

Per your request, let me respond to each of the comments raised in your letter.

1. ***Discrepancy between number of state compliance actions carried over from 2005 to 2006:***
Additional quality assurance measures have been implemented to better track the status of state compliance actions carried over from previous inspection years. These numbers will be double checked for accuracy prior to submittal of future program certification attachments.
2. ***Some operator units not inspected in accordance with time intervals established in our written procedures.***
Written procedures have been revised to more accurately reflect the risk based approach the UTC pipeline safety program implemented in CY 2006 to prioritize inspection scheduling.
3. ***Verify that operators continue public education programs required under Part 192.616***
The UTC intends to field validate an operator's implementation of their written public awareness plan as part of our scheduled 2008 standard inspections. A separate inspection checklist has been developed and will be used by our inspectors to perform the verifications.



4. ***Ensure timely enrollment of our two newest pipeline inspectors in required PHMSA Training and Qualifications (T&Q) training and maintain all pertinent enrollment documentation.***

Of our two newest inspectors, one has completed seven of the nine mandatory gas and hazardous liquid courses and is scheduled to attend the remainder by April 2008. Our most recent hired inspector has completed one course and is currently on the waitlist for the remainder. These inspectors will also be expected to attend all remaining specialized and elective courses once the priority courses have been completed. Training activities are documented and maintained in our pipeline safety database and the State Employee Progress report maintained by PHMSA T&Q.

Thank you for the courteous and professional manner you demonstrated throughout this evaluation. We look forward to another year of working together with PHMSA on a number of initiatives with a goal of ensuring public safety. Should you have any additional questions or concerns, please contact me at (360) 664-1219.

Sincerely,



David D. Lykken
Acting Director, Pipeline Safety

cc: Mark Sidran, Utilities and Transportation Commission
Chris Hoidal, PHMSA/OPS – Western Region