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November 6, 2012

Mr. David Lykken
Pipeline Safety Director
Washington Utilities and Transportation Commission
PO Box 47250
Olympia, WA. 98504-7250

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State of Washington
UTC
Pipeline Safety Program

Re: Avista's response to the WUTC Letter dated October 9, 2012

Dear Mr. Lykken:

On September 25-26, 2012 Scott Rukke of the WUTC, conducted a Natural Gas Standard Inspection of Avista's Colville District. The following response documents the actions Avista is taking to address the findings from the inspection.

1. **49 CFR §192.743 Capacity limiting and regulating stations: Capacity of relief devices.**

- (a) *Pressure relief devices at pressure limiting stations and pressure regulating stations must have sufficient capacity to protect the facilities to which they are connected. Except as provided in 192.739(b), the capacity must be consistent with the pressure limits of 192.201(a). This capacity must be determined at intervals not exceeding 15 months, but at least once each calendar year, by testing the devices in place or by review and calculations.*

Finding(s) - Area of Concern:

In accordance with Avista Procedure 5.12 and 49 CFR 192.743, Avista conducted an annual relief valve capacity check. During this annual capacity check, district regulator station #539 was noted as needing an orifice change from 1/4" to 3/16". Electronic records for station #539 have a follow-up column that is either checked Y (yes) or N (no) indicating whether follow-up action is necessary.

The electronic records we reviewed indicated that no follow-up action was necessary. Paper records indicated that follow-up work was necessary and was completed on February 4, 2011. In addition, the electronic records did not indicate the new orifice size for the station after it was changed.

Since Avista is transitioning to mostly electronic records, it is important that Avista have proper processes and procedures to ensure that electronic records accurately reflect follow-up actions and work performed.

Avista's Response:

Avista acknowledges the electronic records gap that was identified by Mr. Rukke during the inspection. For many years, the federal code option to perform the "review and calculations" has been executed by Avista's Gas Distribution Design Engineers. It was historically completed and then documented on paper and that paper record has been kept to prove the federal code requirement was met.

In 2011 Avista transitioned to recording this relief capacity inspection, additionally, in our Compliance List Manager (CLM) electronic database. It is here that this inspection was noted but certain fields in the application were not properly formatted to track follow-up actions that were required. Subsequent to the inspection, a system fix request (Tracker #235932) was submitted and is in process of being implemented.

Additional training will be conducted with Avista's Compliance Technicians and applicable Distribution Design Engineers to ensure they understand these CLM system improvements that will ensure, moving forward, the electronic records match the paper records in documenting the "review and calculations" requirement from 49 CFR 192.743.

Respectfully Submitted,



Don Kopczynski
Vice President, Energy Delivery

CC: Kermit Olson, Colville District Manager
David Howell, Gas Compliance Manager
Commission Correspondence File