



1411 E. Mission, PO Box 3727
Spokane, WA 99220-3727

December 7, 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 November 8, 2012

Dear Mr. Lykken:

Between August 29 and September 6, 2012 Patty Johnson of the WUTC, conducted a Natural Gas Standard Inspection of Avista's Clarkston and Pullman Districts. The following response documents the actions Avista is taking to address the findings from the inspection.

1. **49 CFR §192.481 Atmospheric corrosion control: Monitoring.**

(a) *Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion as follows.*

Finding(s):

Avista failed to conduct an atmospheric corrosion inspection of a meter-less riser found by electric power pole #035069.

Avista's Response:

Avista acknowledges the identified probable violation and subsequent finds related to this single incident that included the failure to inspect the meter-less riser identified above as required during the 2009 Atmospheric Corrosion Patrol in Lacrosse, Washington. The riser was not contained within Avista's mapping system and as a result the inspection was not properly identified and completed. The riser has since been cutoff and the Avista mapping system updated. Mapping discrepancies, including meter-less risers, are corrected within the Avista mapping system as they are identified. Correctly mapped features in the Avista mapping system will facilitate proper future inspections.

2. WAC 480-93-018 Records

- (5) *Each gas pipeline company must update its records within six months of when it completes any construction activity and make such records available to appropriate company operations personnel.*

Finding(s):

Avista failed to map the meter-less riser found by electric power pole #035069.

Avista's Response:

Avista acknowledges that related to probable violation number 1 we failed to map the meter-less riser found by the WUTC inspector. Mapping discrepancies are corrected as they are identified in accordance with Specification 4.11 of the Gas Standards. As previously noted this meter-less riser has been removed and the Avista mapping system updated to reflect the change.

3. 49 CFR §192.481 Atmospheric corrosion control: Monitoring.

- (b) *During inspections the operator must give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations and in spans over water.*

Finding(s):

Avista has failed to inspect pipe at pipe supports and at spans over water. Avista failed to inspect pipe at pipe supports at industrial meter 3034. During the inspection, the pipe was lifted and atmospheric corrosion was found and remediated.

Avista's Response:

Avista acknowledges not having inspected and remediated piping under the pipe support at Industrial Meter #3034 in Pullman, Washington. Additional guidance will be added to Avista's Gas Standards Manual, Section 5.12, as part of the 2013 manual update, to direct maintenance personnel to perform this inspection and applicable remediation as part of annual maintenance at industrial meters, regulator stations, gate stations and other similar facilities.

4. WAC 480-93-180 Plans and Procedures

- (1) *Each gas pipeline company must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that are specific to the gas pipeline company's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR §191, 192 and chapter 480-93 WAC, and any plans of procedures used by a gas pipeline company's associated contractors.*
- (3) *The manual must be written in detail sufficient for a person with adequate training to perform the tasks described. For example, a manual should contain specific detailed, step-by-step, instructions on how to maintain a regulator or rectifier, conduct a leak survey or conduct a pressure test.*

Finding 1:

Avista failed to follow its O&M manual and turn in a mapping error found during a leak survey at a meter-less riser located near electric pole #035069, in accordance with O&M Section 4.11.

Avista's Response:

Avista acknowledges that related to probable violation number 1 we failed to map the meter-less riser found by the WUTC inspector. Mapping discrepancies are corrected as they are identified in accordance with Specification 4.11 of the Gas Standards. This riser was not properly identified during the leak survey inspection and subsequently was not mapped.

Finding 2:

Avista failed to include a clear procedure for Pipeline Markers as described in WAC 480-93-124.

Avista's Response:

Avista acknowledges guidance in the company's Gas Standards Manual regarding pipeline marker requirements can be improved. These enhancements will be made to Sections 3.15 and 5.15 and incorporated into the 2013 update of the manual.

Finding 3:

Avista's O&M manual failed to require that pipe on all pipe supports be inspected for atmospheric corrosion in accordance with 49 CFR §192.481(b).

Avista's Response:

Avista acknowledges its O&M manual has lacked specificity around atmospheric corrosion inspections at pipe supports. As noted above in Avista Response to Section 3, Avista's Gas Standards Manual, Section 5.12 will be updated to address this gap.

Respectfully Submitted,



Don Kopczynski
Vice President, Energy Delivery

DK/drh

CC: Jenny Blaylock, Pullman District Manager
Glenn Logsdon, Clarkston District Manager
Commission Correspondence File