



8113 W. GRANDRIDGE BLVD., KENNEWICK, WASHINGTON 99336-7166  
TELEPHONE 509-734-4500 FACSIMILE 509-737-9803  
www.cngc.com

December 4, 2012

David Lykken- Director of Pipeline Safety Program  
State of Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. SW  
P.O. Box 47250  
Olympia, WA 98504-7250

RECEIVED  
DEC 05 2012  
State of Washington  
UTC  
Pipeline Safety Program

Subject: Response to 2012 Operations and Maintenance Manual Review Inspection

Dear Mr. Lykken,

This letter is intended to address the two probable code violations. We are specifically addressing how and when we plan to bring these probable violations into full compliance. The inspection was conducted from October 16-18 and 23, 2012 in Kennewick, WA.

### PROBABLE VIOLATIONS

#### **1. WAC 480-93-180 Plans and Procedures.**

(1) *Each gas pipeline company must have and follow a gas pipeline plan and procedures manual (manual) for operation, maintenance, inspection and emergency response activities that is 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 or procedures used by gas pipeline company's associated contractors.*

*WAC 480-93-200 Reporting requirements (10) When a gas pipeline company is required to file a copy of a DOT Drug and Alcohol Testing Management Information System (MIS) Data Collection Form with the U.S. Department of Transportation, Office of Pipeline Safety, the gas pipeline company must simultaneously submit a copy of the form to the commission.*

#### **Finding(s):**

CNG does not include a procedure to submit a copy of the MIS form to the commission in Procedure CP 72-D Rev 08/02/2007. CNG is currently revising this procedure to incorporate this requirement.

#### **Cascade Response:**

CNGC concurs with Probable Violation 1. The tentative timeframe for the revised procedure to become effective is by the end of Q1 2013.

**2. WAC 480-93-180 Plans and Procedures.**

(1) *Each gas pipeline company must have and follow a gas pipeline plan and procedures manual (manual) for operation, maintenance, inspection and emergency response activities that is 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 or procedures used by gas pipeline company's associated contractors.*

*49 CFR 19.2. 631 Control Room management (c)(2) Conduct a point-to-point verification between SCADA displays and related field equipment when field equipment is added or moved and when other changes that affect pipeline safety are made to field equipment or SCADA displays;*

**Finding(s):**

CNG uses WBI Energy Transmission, Inc., for control room management and their Gas Control Manual; Rev August 2012 does not contain a procedure for conducting a point-to-point verification between SCADA displays and related equipment when changes that affect pipeline safety are made.

**Cascade Response:**

CNGC concurs with Probable Violation 2. CNGC is currently developing the workflow and required procedure for the point-to-point verification between SCADA displays and related equipment. The tentative timeframe for the procedure to become effective is by the end of Q1 2013.

Please contact Tina Beach with questions or comments via email or at (509) 734-4576.

Respectfully Submitted,



Eric Martuscelli,  
Vice President, Operations  
Cascade Natural Gas Corporation