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State of Washington
UTC
Pipeline Safety Program

December 19, 2014

David Lykken
Pipeline Safety Director
Washington Utilities and Transportation Commission
Pipeline Safety Section
1300 S. Evergreen Park Drive S.W.
PO Box 47250
Olympia, WA 98504-7250

Dear Mr. Lykken:

RE: 2014 Natural Gas Standard Inspection- Puget Sound Energy – King County East (Insp. No 5852)

PSE has received and reviewed your letter dated November 13, 2014, regarding the 2014 East King County Audit, and pursuant to your request is submitting the following written response to the three probable violations.

PROBABLE VIOLATIONS

1. **49 CFR §192.721 Distribution systems: Patrolling.**
 - (b) *Mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled-*
 - (2) *Outside business districts, at intervals not exceeding 7 1/2 months, but at least twice each calendar year.*

Finding(s):

In March 2014, UTC discovered a pipeline crossing on the Jenkins Creek Bridge on Covington Way in Covington. PSE confirmed this crossing was not on their bridge patrol list. The bridge had not been patrolled per the code or PSE Gas Operating Standards 2575.3100.4.2 as required. This is a re-occurring issue.

PSE Response:

The pipe crossing Jenkins Creek Bridge was installed in 1973. Periodic patrols of pipe located on bridges has been a requirement of PSE operating standards since prior to that date and was performed by local personnel utilizing various documentation methods. Beginning in 2005, PSE began to create individual maintenance plans for each bridge location in SAP to provide better tracking and documentation of required inspection activities. At that time, the Jenkins Creek Bridge was inadvertently omitted from the list of bridges requiring inspection. In March of this year, PSE created an individual maintenance plan for this location (PBS_508). The piping on the bridge was inspected April 1, 2014, and no atmospheric corrosion was present.

As a result of the UTC's finding, PSE's Gas Operating Standards were updated. Where new designs include piping on a bridge, the Standards now require that notifications occur to ensure that a maintenance plan for the new piping is created. In addition, all previously identified locations with pipe on bridges will be indicated on company maps. This will aid field personnel in confirming pipe on bridge locations as part of their normal patrol, leak survey, and continuing surveillance activities. Finally, PSE will be utilizing its GIS to compare existing pipeline locations to known water features and bridges to determine if additional locations may exist where pipelines are located on bridges. This analysis will be completed by 12/31/2015.

2. **49 CFR §192.455 External corrosion control: Buried or submerged pipelines installed after July 31, 1971.**

(a) *Except as provided in paragraphs (b), (c), and (f) of this section, each buried or submerged pipeline installed after July 31, 1971, must be protected against external corrosion, including the following:*

- (1) *It must have an external protective coating meeting the requirements of §192.461.*
- (2) *It must have a cathodic protection system designed to protect the pipeline in accordance with this subpart, installed and placed in operation within 1 year after completion of construction.*

Finding(s):

As part of evaluating leak records, all corrosion records were reviewed. One record for a leak at 4625 S. 239th Pl in Auburn was shown on PSE's mapping system as a polyethylene (PE) service and on the D4 card as a PE service. In reality, the service was PE up to the riser, where it transitioned to steel. This buried, steel, gas carrying portion of the service did not have cathodic protection per the code. As a result, a corrosion leak occurred on November 21, 2013.

PSE did not know this service was constructed in this manner as it was incorrectly noted on PSE mapping and the D4 card. The concern is that other services in this immediate area may be constructed similarly as most of the homes appear to be built in 1977 era by Hillis Homes, Inc.

PSE Response:

PSE completed a field review of service installations in the immediate area and determined that there were no additional unprotected steel service risers.

PSE will be expanding the review to the entire distribution system to identify whether other isolated facilities may exist outside of the immediate neighborhood of the identified service. A records review has begun. A list of candidate services is being identified for follow-up. Follow up may include reviewing original installation records, modification records, CP records, and/or field reviews. PSE will complete the review, develop an inspection and remediation plan, and communicate the status of the assessment and path forward to the WUTC by 6/1/2015.

3. **WAC 480-93-188 Gas leak surveys.**

(3) Each gas pipeline company must conduct gas leak surveys according to the following minimum frequencies:

(c) Gas pipelines operating at or above two hundred fifty psig- at least once annually, but not to exceed fifteen months between surveys;

Finding(s):

- 1) During leak survey records review, it was noted that in 2010, and 2012, PSE failed to leak survey the following plats for the HP 250 Kent Black Diamond Supply Main: 223079C, 223079D, 223079E, 224078, 225075, 225078, 226075, 226076, 226077, 226078, 227077, 227078. PSE indicated that the pressure on the line had increased in 2009 (DOCKET PG-090811) above 250 psi, however, the group responsible for managing and scheduling leak surveying was apparently unaware of the change and did not increase the leak survey frequency per the code.
- 2) During leak survey records review, it was noted that in 2013, PSE failed to leak survey the HP 16" and HP 8" for Plat 183097 per the code.

PSE Response:

PSE conducted a review of the HP MAOP maps to ensure that all HP Supply pipelines have been correctly identified for leak survey. PSE also reviewed all 250 psig and greater pipelines to ensure the appropriate survey frequency is identified in the leak survey database. No other discrepancies were identified. This was completed 10/08/2014.

In addition, the internal process for uprates and pressure increases will be revised to ensure appropriate notifications occur when any HP uprate or pressure increase is performed. Maintenance Programs will evaluate the change in pressure to determine if new survey requirements apply, and update the leak survey database as necessary. This process change is underway, and will be completed by February 13, 2015.

PSE is also working on adding a new designation for pipelines operating above 250 psig to our GIS system maps. This new designation would be "HP 250". Maintenance Programs has added a process to perform an annual audit of the "HP 250" system. This audit will compare the GIS maps with the leak survey database to ensure that all "HP 250" pipelines have been assigned the appropriate leak survey frequency.

We hope the information provided is responsive to the findings of the UTC inspection. PSE is committed to constructing, operating, and maintaining a safe gas pipeline system.

Sincerely,



Booga K. Gilbertson
Vice President, Operations

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