



# PUGET SOUND ENERGY

Puget Sound Energy  
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PSE.com

October 03, 2016

Alan Rathbun  
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

**RECEIVED**  
SEP 30 2016  
State of Washington  
UTC  
Pipeline Safety Program

Dear Mr. Rathbun:

**RE: 2016 Natural Gas Standard Inspection- Puget Sound Energy – King County East (Insp. No 6747)**

PSE has received and reviewed your letter dated August 31, 2016 regarding the 2016 East King County Audit, and pursuant to your request is submitting the following written response to the two areas of concern:

### AREAS OF CONCERN

1. **49 CFR §192.747 Valve Maintenance: Distribution systems**
  - (a) *Each valve, the use of which may be necessary for the safe operation of a distribution system, must be checked and serviced at intervals not exceeding 15 months, but at least once a year.*
  - (b) *Each operator must take prompt remedial action to correct any valve found inoperable, unless the operator designates an alternate valve.*

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

During the field portion of the inspection, an emergency inspection valve, VA-04267, was inoperable by one person. It is unknown if the valve can be operated by two people or if the valve is completely inoperable. Please provide documentation of any remedial action taken to ensure this valve operates as intended during an emergency. If two gas first response personnel are needed to operate a valve, please provide documentation that demonstrates that two personnel will be dispatched, in the event of an emergency, to each location that requires two individuals to safely complete the task.

**PSE Response:**

On 9/22/16 PSE operated valve VA-04267. The valve was operated by two technicians under notification #1734201. Notes have been added in PSE's SAP database to identify the valve as requiring two persons for operation. PSE will review all emergency section valves and ensure that notes are added to SAP for each valve requiring two persons for operation. PSE will communicate the location of this information to appropriate personnel to ensure it is available for use during an emergency. PSE will complete this review, data entry, and communication by December 31, 2016.

2. **WAC 480-93-110 Corrosion control**

(2) *Each gas pipeline company must complete remedial action within ninety days to correct any cathodic protection deficiencies known and indicated by any test, survey, or inspection. An additional thirty days may be allowed for remedial action if due to circumstances beyond the gas pipeline company's control the company cannot complete remedial action within ninety days. Each gas pipeline company must be able to provide documentation to the commission indicating that remedial action was started in a timely manner and that all efforts were made to complete remedial action within ninety days. (Examples of circumstances allowing each gas pipeline company to exceed the ninety-day time frame include right of way permitting issues, availability of repair materials, or unusually long investigation or repair requirements).*

**Finding(s):**

During the field portion of the inspection, we obtained low readings at the following locations:

- 7/26/2016 -712mV CSE PSP (galvanic/on) at 19207 37th Ave in Lake Forest Park, WA.
- 7/27/2016 -611mV CSE PSP (on) and -493mV CSE PSP (off) at 16536 121st Ave SE, Renton, WA.

If uncorrected within 90 days, these conditions could lead to probable violations.

**PSE Response:**

In response to the low read at 19207 37<sup>th</sup> Ave in Lake Forest Park, PSE promptly created a notification to remediate the issue. An anode was installed on 8/3/16 and a PSP read of -1.23V was obtained.

At the location of 16536 121<sup>st</sup> Ave SE in Renton, to demonstrate compliance with cathodic protection requirements, PSE tested the site using the 100mV polarization shift criteria. On 7/29/16 a PSE technician obtained an instant off read of -311mV. A depolarized read of -198mV was obtained on 8/1/16. The negative polarization shift of 113mV exceeds the required criterion demonstrating the pipe has adequate cathodic protection.

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,

A handwritten signature in black ink, appearing to read "Booga K. Gilbertson", with a long horizontal flourish extending to the right.

Booga K. Gilbertson  
Vice President, Operations

Cc: Cara Peterman, Director Compliance  
Cheryl McGrath, Manager Compliance Programs  
Harry Shapiro, Director Gas Operations