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September 2, 2015

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Alan E. Rathbun
Pipeline Safety Director
P.O. Box 47250
Olympia, WA 98504-7250

RE: 2015 Natural Gas Standard Inspection – Lamb Weston/BSW (Insp. No. 6219)

Dear Mr. Rathbun:

We are in receipt of your letter dated August 3, 2015 regarding the above referenced inspection in May 2015 resulting in five probable violations. All five probably violations were corrected shortly after the inspection and will be discussed below. Three of the five probably violations were associated with a broken wire on cathodic protection reading station, which was repaired shortly after the inspection.

The Lamb Weston/BSW pipeline consists of 4.5 miles from the Williams City Gate to the plant constructed in 1999. BSW contracts with Northwest Metal Fab for maintenance to the gas line.

Discussion of Findings:

- 1. A records review of Lamb Weston's "Cathodic Protection Survey" (dated 02/12/15) revealed a cathodic protection (CP) read of -.241 VDC, below Lamb Weston's protective criteria established at -0.85 VDC. Lamb Weston could not document that remedial action was taken within ninety days as required by code.*

This particular cathodic protection station is offset from the pipeline approximately ten feet. It was found that a county ditch cleaning crew accidentally hit the wire connecting the station. NW Metal Fab indicated that repair materials were not available at time of discovery, but the repairs were completed just after the ninety days with all due diligence. The pipeline maintained proper cathodic protection even though the wire to the test station was inadvertently broken.

- 2. A review of Lamb Weston's One-Call record showed there was an incident where excavation activity took place within 35-feet of underground facilities. When asked by staff, Lamb Weston could not provide documentation that a follow-up inspection had occurred at that location to verify the integrity of the pipeline.*



One call locates are handled by the pipeline manager on the day of or next day of receipt as was observed (and complimented) by the inspectors. The pipeline manager also inspects the line weekly as part of pipeline patrol (only 4.5 miles). The one call locate indicated may have been for a farmer pump station utility pole, which pipeline was marked in response to the one call notification, pole was approximately 12 feet from the pipeline. The pipeline patrol indicated normal conditions, no excavation close to the pipeline.

3. *During the field verification portion of the inspection, a CP read of -0.198, below Lamb Weston's protective criteria established at -0.850 VDC was recorded at test station # 12. Lamb Weston failed to provide a level of cathodic protection required by code.*

See finding #1 for explanation of CP station. Repair was made shortly after the inspection and pipeline protection was not compromised.

4. *Operations records indicated that Lamb Weston's pressure testing equipment and instrumentation is regularly calibrated on a set schedule Pressure testing must be performed with calibrated equipment. During the field verification portion of the inspection, Northwest Metal Fab personnel did not have calibrated gauges on hand to perform lock-up and stroke testing and performed the testing with non-calibrated equipment.*

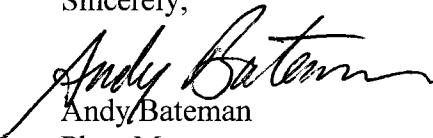
Northwest Metal Fab personnel were not made aware that a pressure test would be included in the inspection, but rather O&M audit. When asked to perform the pressure test, personnel complied with a service gauge. The pipeline manager will ensure that in future inspections, crews will be prepared with proper calibrated equipment.

5. *NW Metal Fab personnel were not cognizant of the Abnormal Operating Condition (AOC) associated with a low CP read at a CP survey test site where there were obvious physical signs that the pipeline may have suffered excavation damage.*

See finding #1 for explanation of CP station. The gas line is located four to five feet deep, well below the level of the ditch cleaning. No excavation was performed in the immediate area of the pipeline and no pipeline damage occurred.

We respectfully request that the findings responses be reviewed and the inspection be closed without further commission action. Lamb Weston/BSW makes every effort to comply with regulations regarding operation of the natural gas pipeline. If you have questions, please contact Andy Bateman at 509-349-2210, andy.bateman@conagrafoods.com or Marvin Price at 509-349-2210, marvin.price@conagrafoods.com.

Sincerely,


Andy Bateman
Plant Manager

Lamb Weston.
BSW