

**From:** Dorrough, Anthony (UTC)  
**Sent:** Friday, October 23, 2015 10:26 AM  
**To:** marvin.price@conagrafoods.com; andy.bateman@conagrafoods.com  
**Cc:** Subsits, Joe (UTC); Rathbun, Alan (UTC); Woodard, Marina (UTC); Crawford, Denise (UTC)  
**Subject:** FW: 2015 Natural Gas Standard Inspection- Lamb Weston/BSW (Insp.No.6219)

Marvin,

I forgot to mention that we will need a response from Lamb Weston no later than November 13, 2015, otherwise, further action may be taken by the Commission. Please contact me with any questions or concerns.

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**From:** Dorrough, Anthony (UTC)  
**Sent:** Friday, October 23, 2015 7:38 AM  
**To:** 'marvin.price@conagrafoods.com' <marvin.price@conagrafoods.com>; 'andy.bateman@conagrafoods.com' <andy.bateman@conagrafoods.com>  
**Cc:** Subsits, Joe (UTC) <JSubsits@utc.wa.gov>; Rathbun, Alan (UTC) <arathbun@utc.wa.gov>  
**Subject:** 2015 Natural Gas Standard Inspection- Lamb Weston/BSW (Insp.No.6219)

Marvin,

I'm responding to the "Discussion of Findings" response from Lamb Weston we received in September. The purpose of this communication is to carefully outline what we are looking for in the hopes of closing this inspection without a need for any further commission action.

**Discussion of Findings:**

**1- Finding(s):**

A records review of Lamb Weston's "Cathodic Protection Survey" (dated 02/12/15) revealed a cathodic protection (CP) read of -0.241 VDC, below Lamb Weston's protective criteria established at -0.850 VDC. Lamb Weston could not document that remedial action was taken within ninety days as required by code.

**What We need:**

*Northwest Metal Fabrication (NW Metal Fab) indicated that repairs were completed just after ninety days with all due diligence, please provide documentation to the commission verifying when remedial action was started and completed.*

**2- Finding(s):**

A review of Lamb Weston's One-Call records showed that 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.

**What We Need:**

*Please provide documentation showing that there is presently or will be moving forward, follow-up inspections when there is reason to believe the pipeline has been damaged, as part of Lamb Weston's damage prevention program.*

**3- Finding(s):**

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

**What We Need:**

*NW Metal Fab indicated that repairs were completed just after ninety days with all due diligence, please provide documentation that shows there is currently the proper level of cathodic protection as required by the code, at test station #12.*

**4- Finding(s):**

Operations records indicate that Lamb Weston's pressure testing equipment and instrumentation is regularly calibrated on a set schedule. Pressure testing must always be performed with calibrated equipment. During the field verification portion of the inspection, NW 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.

**What We Need:**

*Since NW Metal Fab personnel has stated that they were not made aware of the fact that there would be pressure tests as part of the audit, and therefore did not have calibrated gauges on hand for the inspection. And subsequently, since Lamb Weston's pipeline manager has stated that he will ensure that in future inspections crews will be prepared with properly calibrated equipment, staff and the commission are satisfied with this response.*

**5- Finding(s):**

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 seemingly obvious physical signs that the pipeline may have suffered excavation damage.

**What We Need:**

*Since NW Metal Fab personnel, after looking into this further, has stated that no excavation was performed in the immediate area of the pipeline and that no damage had occurred, staff and the commission are satisfied with this response.*

If Lamb Weston can provide the needed information referenced above, we will review the information, complete this inspection, and follow up with a closure letter. Let me know if you have any questions or concerns.

Thank You

**Anthony Dorrough**  
WUTC Pipeline Safety Division  
1300 S. Evergreen Park Dr. SW  
P.O. Box 47250  
Olympia, WA 98504  
Hours: Mon - Thu 7-5:30pm  
**Office: 360-664-1318**  
**Mobile: 360-481-4035**