



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

621 Woodland Square Loop S.E. • Lacey, Washington 98503

P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY (360) 586-8203

Sent Via Email and FedEx

September 16, 2020

Booga K. Gilbertson
Sr. Vice President Operations
Puget Sound Energy
355 110th Ave NE, M/S EST 11W
Bellevue, Washington 98004

RE: 2020 Natural Gas Standard Inspection – PSE Lewis-Thurston Unit – (Insp. No. 8041)

Dear Ms. Gilbertson:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Standard inspection of Puget Sound Energy's (PSE) Lewis-Thurston Unit. A records review conducted virtually via WebEx was conducted from June 22, 2020 to June 25, 2020. A subsequent field inspection of PSE's assets in this unit was conducted from July 6, 2020 to July 9, 2020.

Our inspection indicates two area(s) of concern as noted in the enclosed report. Unless corrected, these concerns could lead to future potential violations of state and/or federal pipeline safety rules.

Your response needed

Please review the attached report and respond in writing October 19, 2020. The response should include how and when you plan to bring the area of concern into full compliance.

What happens after you respond to this letter?

The attached report presents staff's decision on the area of concern and does not constitute a finding of probable violation by the staff at this time. If this issue is not resolved this matter may result in the issuance of a notice of probable violation.

Puget Sound Energy
2020 Standard Inspection Lewis-Thurston
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If you have any questions or if we may be of any assistance, please contact Dennis Ritter at (360) 402-0066. Please refer to the inspection number noted in the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

Sean C. Mayo
Pipeline Safety Director

cc: Cara Peterman, Director of Enterprise Risk Management, Puget Sound Energy
Duane Henderson, Manager Gas System Integrity, Puget Sound Energy
Harry Shapiro, Director of Gas Operations, Puget Sound Energy
Kaaren Daugherty , Manager Compliance Programs, Puget Sound Energy

UTILITIES AND TRANSPORTATION COMMISSION
2020 Natural Gas Pipeline Safety Inspection
Puget Sound Energy: Lewis-Thurston Unit

The following areas of concern of Title 49 CFR Part 192 and WAC 480-93 were noted as a result of the 2020 inspection of the PSE's Lewis-Thurston unit. The inspection included a random selection of records, operation and maintenance (O&M), emergency response, and field inspection of the pipeline facilities.

AREA OF CONCERN

1. 49 CFR §192.481 Atmospheric Corrosion Control: Monitoring

(b) During inspections the operator must give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbanded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water.

(c) If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion as required by §192.479

Finding(s):

During the field portion of the 2020 Lewis-Thurston inspection, it was noted that the pipe supports (steel hoop hold down) appeared to be touching the top of the 6-inch IP pipe attached to the 5th Ave bridge in Olympia WA (see photo below). There was no evidence of corrosion product noted, however, the contraction and expansion of the steel line will eventually rub off the coating and expose the bare steel to atmospheric corrosion. As this area of your system is near salt water, it should be corrected before the next scheduled atmospheric inspection of this asset.



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

(1) Each gas pipeline company must have and follow a gas pipeline plan and procedure 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 C.F.R. §§ 191, 192 and chapter 480-93 WAC, and any plans or procedures used by a gas pipeline company's associated contractors.

PSE's Gas Field Procedures 415.1200 Monitoring Atmospheric Corrosion Safety

General For gas vault entry, refer to Employee Safety & Health Program Appendix 6-10, "Confined Space Entry for Gas Vaults" for safe work practices.

Finding(s):

During the field portion of the 2020 Lewis-Thurston inspection, PSE's PI inspector described an atmospheric corrosion inspection (location in yellow below) in downtown Centralia which required entry into what appeared to be a confined space (see photo below):

PBS-0187 312.008 314.011 Railroad AVE AC INSPECTION-NORTH OF E MAPLE G1 1870431

Apparently PSE has an asset which passes through what was described as a box culvert for China Creek. This inspection should be vetted by appropriate safety personnel at PSE before the next scheduled inspection in order to ensure that appropriate confined-space entry safety precautions are being followed.

