

April 7, 2010

U. S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety
Southern Region Office
233 Peachtree Street, Suite 600
Atlanta, GA 30303

Attention: Ms. Linda Daugherty, Director

Re: CPF No. 2-2010-1006M
Tennessee Gas Pipeline

Dear Ms. Daugherty:

We are in receipt of your Notice of Amendment (“NOA”) dated March 11, 2010, in which the Southern Region of the Pipeline and Hazardous Materials Safety Administration (“PHMSA”) asserts that an apparent inadequacy was found within Tennessee Gas Pipeline Company’s (“TGP”) plans or procedures relative to its Operator Qualification Program. This possible inadequacy was identified during an inspection that occurred September 22, 2009, in Clay City, Kentucky. Following is PHMSA’s finding in bold text and quotation marks along with TGP’s response.

“TGP has not identified a covered task, as required of 192.805(a). TGP personnel perform routine maintenance and inspection of compressor unit shutdown devices as addressed in the *Compressor Operations Policies and Procedures Manual* used by TGP. TGP personnel are qualified to perform tests of engine and compressor safety shutdown devices, including overspeed devices, per *El Paso Energy Task Qualification Standard, Task No. 051CPS, Test Safety Devices (Non RTU/PLC Systems)*. This task is not designated as a DOT Operator Qualification covered task.”

TGP Response:

During the time of the inspection in Clay City, the PHMSA inspector was inadvertently provided the wrong Operator Qualification task upon his inquiry. Rather than Task Qualification Standard No. 051CPS, which he was given, he should have been provided Task No. 001CPS, “Read/Verify/Maintain Operating Parameters on Reciprocating Drivers and Compressors”. This task is identified as a covered task pursuant to 49 CFR 192.805(a) in TGP’s Operator Qualification Plan and has been so identified since April of 2001. Consequently, TGP believes no inadequacy exists within TGP’s Operator Qualification plans and procedures.

We apologize for any confusion that may have resulted when your inspector was provided the wrong task description. The description of Task No. 001CPS is attached for your records.

RECEIVED APR 8 2010

Conclusion:

TGP appreciates the opportunity to respond to the Notice of Amendment (NOA). We respectfully request that PHMSA repeal the NOA since there really was no inadequacy in TGP's Operator Qualification plans and procedures as discussed above. We appreciate your attention to this matter and look forward to working with you and your staff in continuing to promote pipeline safety.

Respectfully submitted,



William Cope
Vice President, Eastern Operations

cc: Mohammed Shoab, Southern Region, PHMSA

<< Back

Print this page

Print Eval Form

Show Evaluators

Show AOC



Task Qualification Standard

READ/VERIFY/MAINTAIN OPERATING PARAMETERS ON RECIPROCATING DRIVERS AND COMPRESSORS

Task No. 001CPS

Revision Date: 01/05/10

FUNCTIONAL RESPONSIBILITY : PLANT

SKILL LEVEL : B

DOT OPERATOR QUALIFICATION TASK : YES

TASK DESCRIPTION : Read, verify and maintain operating parameters on reciprocating drivers and compressors.

PREREQUISITES :

QUALIFICATION CRITERIA :

1. Locate and describe acceptable operating parameters for engine and compressor:
 - a. Temperature: Oil, Water, Exhaust, Suction, Discharge
 - b. Pressure: Oil, Water, Turbo Boost, Suction, Discharge
 - c. RPM, Timing
 - d. Heat rate/bsfc
 - e. Differential: Oil, Air
 - f. Flow Rate: Lube Oil
2. Find and explain primary O&M and referenced Policies and Procedures applicable to this task.
3. Given six (6) unacceptable operating parameters, describe corrective actions.
4. Check ignition system for proper operation, if applicable.
5. Check/adjust air/fuel gas ratio controller for proper setting, as determined by evaluator.
6. Given an unacceptable gas and jacket water temperature scenario, if applicable, describe corrective actions.
7. Collect jacket water sample in accordance with company policies and procedures.
8. Check glycol for % concentration, if applicable, and describe acceptable limits.
9. Check fluid levels and explain how to correct unacceptable levels:
 - a. Water
 - b. Oil
 - c. Hydraulic, if applicable
10. What is the unit's horsepower and torque?
11. Perform or simulate unit load adjustment.
12. Perform or simulate speed adjustment.

- 13. Identify or describe how to recognize defective compressor valves.
 - 14. Define Abnormal Operating Condition (AOC).
 - 15. Describe at least two Task Specific AOCs and two Generic AOCs that may be encountered while performing this task and the appropriate response to each, including the reporting process.
- Note: Upon completion of the task evaluation, the evaluator will review with the person being tested, all applicable task specific AOCs and the list of Generic AOCs.

Performed on Pipeline Facility ?	Operation or Main Task ?	Required by 49CFR 192 ?	Affects Pipeline Operations or Integrity ?	49CFR 192 Section/s	49CFR 195 Section/s	Span of Control
Y	Y	Y	Y	605b(6),b(7),c(8)		3

[Click here to download the above Task Detail as a file in a Text format](#)