

Paul V Fant
President and Chief Operating Officer

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VIA CERTIFIED MAIL AND E-MAIL

October 1, 2014

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

RE: Response to NOTICE OF AMENDMENT (CPF 2-2014-1004M)

Dear Mr. Lemoi:

On July 30-31, 2014, representatives of the Pipeline and Hazardous Materials Safety Administration ("PHMSA"), Southern Region, Office of Pipeline Safety inspected the Pipeline Public Awareness Plan and Operator Qualification Plan of Carolina Gas Transmission ("CGT") as part of an Integrated Inspection that began February 25, 2014. On September 11, 2014, PHMSA issued a Notice of Amendment (**CPF 2-2014-1004M**) to CGT, which identified apparent inadequacies in CGT's Pipeline Public Awareness Plan and Operator Qualification Plan. In response to this Notice of Amendment, CGT has revised its Pipeline Public Awareness Plan and its Operator Qualification Plan to address the inadequacies identified in the Notice of Amendment. A complete copy of each plan is being provided herewith along with excerpts to address the specific revisions made in response to the Notice of Amendment.

CGT respectfully requests that any correspondence and communications regarding this response letter be directed to:

Laura Comstock
Manager Operations Support
Carolina Gas Transmission Corporation
220 Operations Way J-48
Cayce, South Carolina 29033

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Should you have additional questions, please call me at (803) 217-6457.

Sincerely,



Paul V. Fant
President and Chief Operating
Officer

cc: Mathew Gissendanner
Laura Comstock

Item 1: § 192.616 Public Awareness

“CGT’s written Pipeline Public Awareness Plan (PPAP) did not provide procedures for conducting an annual audit or review to determine where the program had been developed and implemented in accordance with API RP 1162”.

“API RP 1162, *Section 8.3 Measuring Program Implementation*, requires an operator to complete an annual audit or review of whether the program has been developed and implemented according to API RP1162 guidelines. While CGT’s PPAP stated the SCANA Public Awareness Committee will: “*Ensure annual reviews of program implementation are conducted using third party audits and/or, internal self-assessments and/or regulatory inspections,*” it did not provide procedures on how the annual reviews were to be conducted.”

Response to Item 1:

CGT has amended its written Public Awareness Program to state more specifically:

Assess Program Implementation

The Program Implementation Assessment will be conducted and documented by the Public Awareness Coordinator annually when the year’s activities have been completed. The assessment process will utilize the template provided in the 2010 version of the RP1162 second edition (AnnexC) and will verify that:

- the program addresses the objectives, elements, and baseline schedule as described in RP 1162.
- the written program has been implemented as planned and documented appropriately.

Any improvements or conclusions drawn from the assessment will be documented and integrated immediately into the program.

An alternate assessment method may be implemented at the Public Awareness Coordinator’s discretion. Alternate assessment methods include assessment by a third party or a regulatory inspection.

Item 2: § 192.805 Qualification Program

“CGT’s Operator Qualification (OQ) Plan did not include a span of control number for all covered tasks.”

“CGT’s OQ Plan, Appendix 1 – Covered Task List Matrix, identified how many non-qualified individuals could perform a given task under the direction and observation of an individual qualified to perform the task. The Appendix listed a span of control number for each of CGT’s identified covered tasks except the covered task for Pipeline Pigging (i.e. 107PIG). Instead, the span of control number for covered task 107PIG was listed as a question mark (?).”

Response to Item 2:

CGT has amended its written OQ Plan to include a span of control for Pipeline Pigging (107PIG) of two (2).

Row #	Old Task	Old Task Description	New Task	New Task Description	B31Q	Interval	Span	Init	Requal
36	CGQ 335	• Pipeline Pigging	107PIG	• Pipeline Pigging	1641	3	2	SK	K

Item 3: § 192.805

“CGT’s Operator Qualification (OQ) Plan did not include a re-evaluation interval for all covered tasks.”

“CGT’s OQ Plan, Appendix 1 – Covered Task List Matrix, identified the intervals at which the evaluation of an individual’s qualifications is needed for each of CGT’s identified covered tasks except the covered task for Pipeline Pigging (i.e. 107PIG). Instead, the evaluation interval for covered task 107PIG was listed as a question mark (?).”

Response to Item 3:

CGT has amended its written OQ Plan to include a re-evaluation interval of three (3) years for Pipeline Pigging (107PIG).

Row #	Old Task	Old Task Description	New Task	New Task Description	B31Q	Interval	Span	Init	Requal
36	CGQ 335	• Pipeline Pigging	107PIG	• Pipeline Pigging	1641	3	2	SK	K

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