



SENT TO COMPLIANCE REGISTRY  
Hardcopy  Electronically   
# of Copies 1 / Date 6.30.08

06-30-08P12:40 RCVD

June 25, 2008

CC-1497

CPF 5-2008 - 0014M

Mr. Chris Hoidal  
Director, Western Region  
Pipeline and Hazardous Materials Safety Administration  
12300 W. Dakota Ave., Suite 110  
Lakewood, CO 80228

**Reference: CPF 5-2008-0014W**

**Subject: Response to a DOT "Notice of Amendment" Concerning Inadequacies in MSCC's Procedural Manual.**

Dear Mr. Hoidal:

Mr. Nguyen, of the DOT, conducted an onsite inspection of our pipeline facility from February 19 to February 21, 2008. A result of that inspection was a DOT "Notice Of Amendment" notifying Midway Sunset Cogeneration Company (MSCC) of seven (7) inadequacies found within MSCC's procedural manual (Please find attached a copy of "Notice Of Amendment" CPF 5-2008-0014W. MSCC's following plan is numbered in concert with the "Notice of Amendment":

1. The Midway Sunset Cogeneration Company procedural manual did not specify the requirement to modify their procedures when deficiencies are found.

Response: MSCC has included a statement, in Section 100 and Section 501 specifying the requirement to modify the procedures when deficiencies are found.

2. The Midway Sunset Cogeneration Company procedural manual did not specify the criteria for determining which pipe must be replaced or removed from service.

Response: MSCC has included, in Section 301, the criteria to be used for determining which pipe must be replaced or removed from service.

3. The Midway Sunset Cogeneration Company procedural manual did not specify that repair records must be retained as long as the pipe remains in service. In addition, the retention time for patrols, surveys, and other required inspections or tests was not specified.

Response: MSCC has included, in Section 101, a statement specifying the retention time for repair records, inspections, tests, etc.

4. The Midway Sunset Cogeneration Company procedural manual did not mandate that welding operations be protected from adverse weather.

Response: MSCC has included, in Section 403, a statement specifying that welding operations will be protected from adverse weather.

5. The Midway Sunset Cogeneration Company procedural manual did not explicitly preclude the use of miter joint welds.

Response: MSCC has included, in Section 403, a statement precluding the use of miter joint welds.

6. The Midway Sunset Cogeneration Company procedural manual did not specify how to align and prepare pipe materials for welding.

Response: MSCC has included, in Section 403, a statement specifying how to align and prepare pipe materials for welding.

7. The Midway Sunset Cogeneration Company procedural manual did not specify that a qualified individual must perform and document visual inspection of all welding.

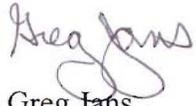
Response: MSCC has included, in Section 403, a statement specifying that a qualified individual must perform and document visual inspection of all welding.

MSCC has revised the procedural manual. Copies of the revisions are available to the DOT on request. MSCC embraces the importance of public safety and, therefore, wishes not only to meet the letter of the law but the overriding intent.

MSCC commends Mr. Nguyen's professional demeanor during the inspection. It proved an excellent opportunity for MSCC's employees to interact with and learn from a knowledgeable, pleasant, DOT representative.

If you have any questions or comments, please email me at; [GJans@Edisonmission.com](mailto:GJans@Edisonmission.com) or call me at (661) 768-3000 ext. 3018.

Sincerely,

A handwritten signature in cursive script that reads "Greg Jans".

Greg Jans  
Plant Manager

KA/ad

Attachment

Cc: File cc-1497  
CEC  
DOT Form 1  
D. Faiella  
J. Alvidres  
K. Aspinall  
R. Smith