



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

SEP - 1 2005

Mr. Randy Barnard
Vice President, Operations
Williams Gas Pipeline
2800 Post Oak Boulevard
Houston, TX 77056

Re: CPF No. 4-2003-1003M

Dear Mr. Barnard:

Enclosed is the Order Directing Amendment issued by the Associate Administrator for Pipeline Safety in the above-referenced case. It makes findings of inadequate procedures and requires that you amend certain of your operations and maintenance procedures. When the terms of the Order are completed, as determined by the Director, Southwest Region, OPS, this enforcement action will be closed. Your receipt of the Order Directing Amendment constitutes service of that document under 49 C.F.R. § 190.5.

Sincerely,

James Reynolds
Pipeline Compliance Registry
Office of Pipeline Safety

Enclosure

cc: Rod Seeley, Region Director
Southwest Region, OPS

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
OFFICE OF PIPELINE SAFETY
WASHINGTON, DC 20590

In the Matter of

Williams Gas Pipeline

Respondent.

CPF No. 4-2003-1003M

ORDER DIRECTING AMENDMENT

Between July 16, 2001 and June 28, 2002, pursuant to 49 U.S.C. § 60117, a representative of the Office of Pipeline Safety (OPS) conducted an on-site pipeline safety inspection of Respondent's facilities and records pertaining to its Texas Gas onshore and offshore pipeline systems consisting of Morgan City, Youngsville, Woodlawn, Offshore Gas, Eunice, Pineville, Columbia, Bastrop-Guthrie, and Sharon districts in Louisiana, and its Central natural gas pipeline systems consisting of Independence-Joplin, Alva, Edmond, and Blackwell districts in Oklahoma and Texas. As a result of the inspection, the Director, Southwest Region, OPS, issued to Respondent, by letter dated March 25, 2003, a Notice of Amendment (NOA). The NOA alleged inadequacies in Respondent's operations and maintenance procedures and proposed to require amendment of Respondent's procedures to comply with the requirements of 49 C.F.R. Part 192.

By letter dated April 28, 2003, Respondent responded to the Notice by requesting a hearing. Respondent submitted written information and explanations on September 10, 2003, and the hearing was held via teleconference on September 16, 2003. After the hearing, Respondent provided further information for the record on October 8, 2003.

Item 1 of the NOA alleged that Respondent's procedures for welder qualifications were inadequate because they were inconsistent with the requirement that for welders to re-qualify every six months by radiographic non-destructive testing, a complete weld must be made and found acceptable under applicable criteria. In its response and at the hearing, Respondent argued that its welders who regularly made cap and fill welds should not be required to make a complete weld to re-qualify at the six month interval because they were engaged in the welding "process." Respondent further argued that it believed that the requirement for a welder to make a complete weld in order to re-qualify was an unnecessary economic burden on the production process.

49 C.F.R. § 192.229(c)(1) generally prohibits welding on a pipeline unless within the preceding six calendar months the welder has had "one weld" tested and found acceptable under Section 3 or 6 of

API Standard 1104 which is incorporated by reference in Part 192. Section 1, paragraph 1.2.2.3 of API Standard 1104 defines a weld as "the completed weld" joining two sections of pipe. Because the root bead is critical to achieving proper weld strength, pipeline welders must maintain their proficiency for making the root pass in order to remain fully qualified. Therefore, welders who are only making cap and fill welds during a given six month period must make a complete weld in order to re-qualify and ensure their overall proficiency. There is nothing in the relevant provisions of API 1104 even suggesting that anything less than a complete weld is required for purposes of six month re-qualification. Respondent also failed to explain why its welders could not occasionally rotate from performing cap and fill welding to performing the root pass in order to ensure their ongoing proficiency in making root bead welds should the need arise over the course of the project. Providing appropriate mechanisms for pipeline personnel to be adequately trained and qualified on an ongoing basis is not an undue economic burden, but rather it is a basic obligation of all pipeline operators in order to ensure public safety.

Accordingly, I find that Respondent's procedures for welder qualifications are inadequate to ensure safe operation of its pipeline system. Pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237, Respondent is ordered to make the following revisions to its procedures:

1. Amend the procedures for welder re-qualifications to reflect the requirement that a complete weld must be made and found acceptable under applicable criteria in order for welders to re-qualify every six months by radiographic non-destructive testing.
2. Submit the amended procedures to the Director, Southwest Region, OPS within 30 days following receipt of this Order.
3. The Regional Director may extend the period for compliance with this Order if the Respondent requests an extension in writing and adequately justifies the reasons for the extension.

Item 2 of the NOA alleged that Respondent's procedures for internal corrosion control monitoring were inadequate in that they failed to provide specific enough guidance to its personnel monitoring fluid samples as to when the quantity of various fluid constituents associated with a corrosive environment reached the applicable thresholds warranting further investigation or corrective measures. With its response and in subsequent correspondence, Respondent submitted amended procedures for internal corrosion control monitoring to address the inadequacies cited in the NOA. The Southwest Region reviewed the revised procedures. Based on the results of this review, I find that Respondent's original procedures as described in Item 2 of the NOA were inadequate, but that Respondent has corrected the identified inadequacies.

The terms and conditions of this Order Directing Amendment are effective upon receipt.

Failure to comply with this Order may result in the assessment of civil penalties of up to \$100,000 per violation per day, or in the referral of the case for judicial enforcement.



Stacey Gerard
Associate Administrator
for Pipeline Safety

SEP - 1 2005

Date Issued

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