

# North Slope Borough

## OFFICE OF THE MAYOR

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*Charlotte E. Brower, Mayor*

### **By E-Mail and Certified Mail**

March 11, 2016

Mr. Chris Hoidal, P.E.  
Director, Western Region  
U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
12300 W. Dakota Ave, Suite 110  
Lakewood, CO 80228

**RE: CPF 5-2015-0021M**

Dear Mr. Hoidal:

On December 29, 2015, the Pipeline and Hazardous Materials Safety Administration (PHMSA) issued a Notice of Amendment (Notice) to the North Slope Borough (NSB). Citing the results of an inspection conducted on August 26, 2015, and September 17, 2015, the Notice alleged inadequacies in NSB's procedures for performing operation, maintenance, and emergency response activities. On January 13, 2016, the Borough requested an extension of the 30-day deadline for submitting a response to the Notice until March 15, 2016. On January 22, 2016, PHMSA granted that request.

As explained below, NSB has amended its written procedures to address all of the concerns identified in the Notice. NSB has also amended other provisions in its procedures to reflect recent changes to the gas pipeline safety regulations and advisory bulletins issued by PHMSA.

#### *Item 1: Notice of Intent to Construct 10 or More Miles of New Gas Pipeline*

The NSB has amended its written procedures to require that PHMSA be provided with notice of its intent to construct 10 or more miles of new gas pipeline as required by 49 C.F.R. § 191.22(c), and to otherwise harmonize this section of the manual with § 191.22. These changes are reflected in Section 3.0 of the NSB's Gas Operations and Maintenance Manual (Revised January 2016) on page 58.

#### *Item 2: Precautions in Excavated Trenches*

The NSB Operations and Maintenance procedures already contain procedures for taking adequate precautions in excavated trenches to protect personnel from the hazards associated with unsafe accumulations of vapor gas as required by 49 C.F.R. § 192.605(b)(9). These procedures are contained in the O&M manual section related to pipeline repairs (§ 192.711), and they reference emergency rescue equipment, including breathing apparatus, rescue harness and lines. For further clarity, NSB has added an additional cross reference to these excavation requirements in its procedures for measuring underground clearance (§ 192.325). The new cross reference is reflected in Section 3 of NSB's Gas Operations and Maintenance Manual (Revised January 2016) on page 111. The existing excavation procedures are located on pages 245 to 250.

*Item 3: Emergency Response Procedure Training*

NSB has amended its written procedures to require that appropriate operating personnel receive training on its emergency response procedures as required by 49 C.F.R. § 192.615(b)(2). The purpose of that training is to ensure that such personnel are knowledgeable of these procedures and to verify that the training is effective. These changes are reflected in Section 3 of NSB's Gas Operations and Maintenance Manual (Revised January 2016) on pages 197 to 199.

*Item 4: Performing Hot Taps*

The NSB Operations and Maintenance procedures for hot taps already contain a statement that persons performing hot taps must be qualified. These procedures are contained in the O&M manual section related to pipeline repairs (§ 192.711). For additional clarity, NSB has added a language to the welding (Hot Taps) section of its O&M manual (§ 192.225) requiring that those individuals performing Hot Tap-related welds be qualified to do so. The NSB's existing procedures can be found in Section 3 of NSB's Gas Operations and Maintenance Manual (Revised January 2016) on pages 253 to 260. The new language requiring qualification of welders performing Hot Tap-related welding can be found on pages 78 to 80.

*Item 5: Testing Reinstated Service Lines*

NSB has amended its written procedures to include provisions for testing reinstated service lines as required by 49 C.F.R. § 192.725. These changes are reflected in Section 3 of NSB's Gas Operations and Maintenance Manual (Revised January 2016) on page 174 and Section 3 of NSB's Nuiqsut Gas Distribution System Operations and Maintenance Manual on pages 17 and 36.

*Item 6: Plastic Pipe Joints*

NSB has amended its procedures to include provisions for qualifying persons to make plastic pipe joints as required by 49 C.F.R. § 192.285(a)(2). These changes are reflected in Task CT 71 of NSB's Operator Qualification Plan (Revised January 2016) on pages 290 to 329.

NSB is attaching the portions of its amended procedures cited above to this letter. Please feel free to contact Tom Nicolos at 907-852-0371 or Morrie Lemen at 907-852-0213 if you have any questions about the information provided in this letter or the attachments. NSB appreciates your time and attention and looks forward to working with PHMSA in the future.

Respectfully,



Charlotte E. Brower  
North Slope Borough Mayor

cc: David Hassell, PHMSA (by e-mail to [david.hassell@dot.gov](mailto:david.hassell@dot.gov))  
Jeffery Gilliam, PHMSA (by e-mail to [Jeffery.Gilliam@dot.gov](mailto:Jeffery.Gilliam@dot.gov))

Attachment: Excerpts from NSB Procedure Manuals