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**CERTIFIED MAIL**

January 28, 2009

Mr. Byron Coy, Jr.  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration  
Mountain View Office Park  
820 Bear Tavern Road, Suite 306  
West Trenton, NJ 08628

**RE: CPF 1-2008-1008W**

Dear Mr. Coy:

This letter is the formal response by Dominion Transmission, Inc. (DTI) to the Warning Letter dated December 30, 2008, stating:

“As a result of the inspection, it appears that you have committed a probable violation of Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The item inspected and the probable violation is:

1. **§192.605 Procedural manual for operations, maintenance, and emergencies**
  - (a) **General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operating and maintenance activities are conducted.**
  - (b) **Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.**

- (1) **Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.**
- (2) **Controlling corrosion in accordance with the operations and maintenance requirements of subpart I of this part.**
- (3) **Making construction records, maps, and operating history available to appropriate operating personnel.**

Section §192.605(b)(3) of the Pipeline Safety Regulations requires that the manual of written procedures must be followed for making construction records, maps, and operating history available to appropriate operating personnel.

The operator failed to provide adequate construction records and/or maps showing the location of the abandoned 2" stub line on the transmission line. The operator failed to communicate with its contractor, the exact locations of an underground abandoned pipeline tap.

On November 13, 2008, DTI had an incident wherein a Dominion backhoe contractor rolled over a below-grade 2" abandoned stub piece connected to the transmission line causing an incident (NRC 889931). The 2" stub fixture was apparently close enough to the surface that the weight of the backhoe disturbed the fixture. Further investigation by DTI revealed that the prior operator used this piece for an instrumentation connection.

According to DTI, the instrumentation had later been removed by the prior owner, leaving the 2" stub line in place just below grade. DTI should have used ILI data or other historical records to identify appurtenances on the transmission line, and then account for them in current maps or records. The failure to identify and communicate the location of the abandoned tap was a contributing factor which led to the incident."

DTI Response:

DTI has reviewed the concerns noted in this Warning Letter, and has taken the following actions to address them:

- *The following statement has been added to the "Instructions" section of each DTI OQ Procedure involving excavation activity on an existing pipeline:*

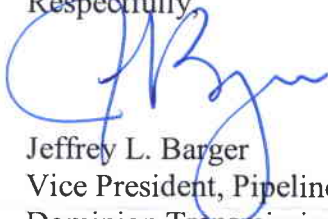
**"Prior to performing this task – Maps, drawings, construction records, and operating history should be reviewed for existing branch connections, taps, and other underground facilities that present potential hazards in accordance with CFR § 192.605(b)(3)."**

*Additionally, the following DTI guidelines have been added to the "References" section of each DTI OQ Procedure involving excavation activity on an existing pipeline:*

- **Excavation Safety Competent Person Checklist**
- **Guide to Excavation Safety**
  
- DTI has completed steps to prevent a reoccurrence in areas where the loop pipeline is currently being constructed parallel to the existing transmission pipeline (TL-522). Records and maps were reviewed to identify any additional taps in these construction areas. The locations of the taps in the construction corridor were surveyed and then, via use of a vacuum truck, the taps were positively identified.
  
- DTI has reviewed the ILI data collected in 2002 (under the previous operator), in an effort to identify any additional stubs. This information was cross-referenced with the existing construction maps and records noted above. DTI plans to reassess the pipeline via ILI in 2009, and will again compare the results to the existing records.
  
- DTI will review all appropriate ILI data (when available) prior to commencing construction projects, in an effort to identify underground appurtenances similar to the one involved in the TL-522 incident.

If you have any questions or require additional information, please do not hesitate to contact Shawn Miller at (304) 627-3404.

Respectfully,



Jeffrey L. Barger  
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Dominion Transmission, Inc.