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November 21, 2014

Mr. Byron Coy
Director – Eastern Region
Pipeline and Hazardous Materials Safety Division
Office of Pipeline Safety
820 Bear Tavern Road, Suite 103
West Trenton, New Jersey 08628

CPF 1-2014-1008M

**Re: Transcontinental Gas Pipe Line Company, LLC (Transco)
Notice of Amendment (NOA)
2013 Inspection Findings for PHMSA System 1287
Procedural Manual Deficiencies**

Dear Mr. Coy:

Transco received the above-referenced PHMSA NOA on October 6, 2014, regarding several deficiencies in its Operations & Maintenance [Procedures] Manual noted during the System Inspection conducted by the Eastern Region Office in 2013. The deficiencies targeted (1) demonstration of effective emergency response training; (2) provision of additional measures for ensuring electrical isolation within pipeline casings; (3) effective management of lost channel communication during ILI runs; (4) failure to incorporate ASME B31.8S operating temperature criteria [i.e. 100° F] in the risk analysis of the SCC threat; (5) failure to incorporate ASME B31.8S magnetic particle inspection criteria in the evaluation of SCC at disbanded coating areas; and (6) deficiencies in defining and evaluating SCC and providing the qualifications required of an employee performing these tasks.

Enclosed for your review, please find revised Operations & Maintenance Manual procedures and narratives addressing the individual deficiencies noted in the NOA and matching the items listed above. The revised procedures have been highlighted or rubricated to draw attention to the changes made to address the NOA findings.

We believe the revised procedures satisfy the concerns noted in the NOA. Should you have any questions or require additional information, please contact me at 713.215.4811 or Marie Sotak at 713.215.2111.

Sincerely,

A handwritten signature in blue ink that reads "Marie G. Sotak for". The signature is written in a cursive style.

Josiah R. Neave
V.P., Safety and Regulatory Compliance

Enclosures

cc: Donald E. Hockaday, III, Williams, Senior Counsel
Stephen D. Potts, Williams, Director – Pipeline and Process Safety
Marie G. Sotak, Williams, Manager – Pipeline Safety Gas and Liquids, East