

January 14, 2105

Total Peaking Services
775 Oronoque Rd
Milford, CT 06461

Byron E. Coy, P.E.
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

RE: CPF 1-2014-3005M

Dear Mr. Coy, P.E.

In response to your NOTICE OF AMENDMENT letter dated December 16, 2014, Total Peaking Services is taking the following actions to address the apparent inadequacies found within TPS's plans or procedures. Procedural changes are being implemented into our Operations Manual and our Work Order system as stated below:

1. **§193.2509 Emergency. procedures**
 - (b) **To adequately handle each type of emergency identified under paragraph (a) of this section and each fire emergency, each operator must follow one or more manuals of written procedures. The procedures must provide for the following:**
 - (3) **Coordinating with appropriate local officials in preparation of an emergency evacuation plan, which sets forth the steps required to protect the public in the event of an emergency, including catastrophic failure of an LNG storage tank.**

The operator's emergency procedures are inadequate in that they do not include requirements for how to document the coordination of evacuation plans with local officials in preparation of an emergency evacuation plan as prescribed in §193.2521 (Operating records).

The operator's procedure states that the operator must conduct the coordination of evacuation plans with public officials; however, the procedure does not require the creation and retention of records.

Response:

In the Operations Manual, language in Section 15 "Security and Emergency Procedure Manual" is being modified to reflect the creation and retention of records in section IV, number F5 to state:

5. Coordination with Local Officials:

The Emergency Procedure Manual will be reviewed at least every two years with local emergency response officials (Fire and Police). The current emergency procedures including evacuation procedures will be reviewed. A record of the meeting will be created in the work management system (WMS) and be retained for a minimum period of five (5) years.

2. §193.2605 Maintenance procedures.

(b) Each operator shall follow one or more manuals of written procedures for the maintenance of each component, including any required corrosion control. The procedures must include:

- (1) The details of the inspections or tests determined under paragraph (a) of this section and their frequency of performance; and**
- (2) A description of other actions necessary to maintain the LNG plant according to the requirements of this subpart.**

The operator's current maintenance procedures are inadequate in that they do not provide sufficient detail on how to inspect for support systems or foundation of each component under §193.2609.

Specifically, the procedures do not include:

1. The criteria for the amount of settlement in the piping area that would require action by the Operator
2. Actions to be taken if the amount of settlement has exceeded the criteria
3. Guidance for reporting anomalies (i.e. ice formations, etc.) that may skew the amount of settlement.
4. Documentation requirements if elevations are not taken during a survey.

RESPONSE:

1. In the Operations Manual, language in Section 17 "Inspection and Maintenance Plan" IMP 6.1.1 is being modified to contain the amount of settlement requiring action by the operator in the piping area. The modification includes:

The results of the pipe elevation survey will be reviewed by the LNG Plant Manager or his management designee and will be accepted as normal if all measurements are 1 inch or less from previous recorded readings. If a survey is determined incomplete or a disparity of more than 1 inch is found, the point(s) will be resurveyed to ensure accurate elevations. If the deviation is confirmed, a consultant will be retained to evaluate the findings and suggest the appropriate corrective measures.

2. Actions to be taken if the amount of settlement has exceeded the criteria are stated in response to 1. (above).

3. Guidance for reporting anomalies is contained in Preventative Work Order No. 364 which states that any anomalies that could skew the elevation survey shall be noted when completing the work order (such as ice formations). Additionally, any missed elevations by the contractor need to be noted on both the work order and elevation survey indicating why the elevation was not taken. The work order will be reviewed and signed off by the Plant Manager or his management designee.

4. Documentation requirements are contained in response 3. above.

The modifications presented in the response letter will be completed no later than January 31, 2015.

If you have any questions on this response, please contact me and we can set up a conference call.

Sincerely,

A handwritten signature in black ink, appearing to read 'R Kopjanski', with a horizontal line extending to the right.

Robert J. Kopjanski, P.E.
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