



U.S. Department
Of Transportation
Pipeline and
Hazardous Materials
Safety Administration

820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628
609.989.2171

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

June 24, 2015

J. Andrew Drake
Vice President, Operations & EHS
Texas Eastern Transmission LP (Spectra Energy Corp)
5400 Westheimer Court
Houston, TX 77056

CPF 1-2015-1014M

Dear Mr. Drake:

From September 23 to 27, 2013, an inspector from Public Utilities Commission of Ohio (OH PUC), acting as agent for the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code, inspected the Texas Eastern Transmission LP (Spectra Energy) facilities and operations and maintenance (O&M) procedures in Wheelersburg, Ohio.

On the basis of the inspection, PHMSA has identified apparent inadequacies within Spectra's plans or procedures, as described below:

1. **§192.225 Welding procedures.**
 - (a) **Welding must be performed by a qualified welder in accordance with welding procedures qualified under section 5 of API 1104 (incorporated by reference, see §192.7) or section IX of the ASME Boiler and Pressure Vessel Code "Welding and Brazing Qualifications" (incorporated by reference, see §192.7) to produce welds meeting the requirements of this subpart. The quality of the test welds used to qualify welding procedures shall be determined by destructive testing in accordance with the applicable welding standard(s).**

Spectra Energy *Welding Procedures Specifications BCS-222.0, Revisions BCS-222.1* dated 3/1/2002 did not have adequate instructions for the type and removal of lineup clamps, in accordance with Section 5.3.2.11 of API 1104 (incorporated by reference, see §192.7).

Section 5.3.2.11 of API 1104 states: "The specification shall designate whether the lineup clamp is to be internal or external or if no clamp is required. If a clamp is used, the minimum percentage of root-bead

welding that must be completed before the clamp is released shall be specified (emphasis added)."

Welding Procedures Specifications BCS-222.0, Revisions BCS-222.1, on page 2, in the section titled "LINE UP CLAMP" shows that external line up clamps are required and the minimum percent root bead before removal is fifty (50) percent. However, in the same procedure, on the same page, in the section titled "REMARKS", it states that "[l]ine up clamps may be either external or internal." This statement is vague and it contradicts the requirement to use external lineup clamps. Additionally, this procedure does not include the minimum percentage of root-bead welding that must be completed before the internal lineup clamp is removed.

Welding Procedures Specifications BCS-222.0, Revisions BCS-222.1 gives inconsistent instructions and lacks details for the type and removal of lineup clamp, in accordance with section 5.3.2.11 of API 1104.

2. **§192.225 Welding procedures.**

(a) Welding must be performed by a qualified welder in accordance with welding procedures qualified under section 5 of API 1104 (incorporated by reference, see §192.7) or section IX of the ASME Boiler and Pressure Vessel Code "Welding and Brazing Qualifications" (incorporated by reference, see §192.7) to produce welds meeting the requirements of this subpart. The quality of the test welds used to qualify welding procedures shall be determined by destructive testing in accordance with the applicable welding standard(s).

Spectra Energy Welding Procedures Specifications BCS-222.0, Revisions BCS-222.1 dated 3/1/2002 did not have adequate instructions for the pre- and post-heat treatment, in accordance with Section 5.3.2.13 of API 1104 (incorporated by reference, see §192.7).

Section 5.3.2.13 of API 1104 states: "The methods, temperature, temperature-control methods, and ambient temperature range for pre- and post-heat treatment shall be specified"

Welding Procedures Specifications BCS-222.0, Revisions BCS-222.1, on page 2, in the section titled "PRE-HEATING", does not include specific instructions for the method of pre-heat treatment and temperature control, in accordance with Section 5.3.2.13 of API 1104.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b). If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order.

If, after opportunity for a hearing, your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 60 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Spectra Energy maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Byron E. Coy, PE, Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, West Trenton, NJ 08628. In correspondence concerning this matter, please refer to **CPF 1-2015-1014M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Additionally, if you choose to respond to this (or any other case), please ensure that any response letter pertains solely to one CPF case number.

Sincerely,



Byron Coy, PE
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration

Cc: Mr. Pete Chace OH PUC

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*