

**NOTICE OF PROBABLE VIOLATION
and
PROPOSED CIVIL PENALTY**

OVERNIGHT EXPRESS DELIVERY

November 2, 2016

Ms. Stephanie Timmermeyer
VP, Safety and Regulatory Compliance
Transcontinental Gas Pipe Line Company
525 Central Park Drive
Oklahoma City, OK, 73105

CPF 1-2016-1009

Dear Ms. Timmermeyer:

From September 15 -19, 2014, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected Williams's Transcontinental Gas Pipe Line Company's (Transco) replacement of sections of mainlines A, B and C within Unit #2881-Elliott City in Owings Mills, MD.

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

- 1. §192.243 Nondestructive testing.**
 - (b) Nondestructive testing of welds must be performed:**
 - (1) In accordance with written procedures, . . .**

Transco failed to nondestructively test a weld in accordance with its written procedure, which references API Standard 1104.

Specifically, Transco did not place an image quality indicator (IQI) across the repaired area of a repair weld as prescribed in API Std. 1104, Subsection 11.1.6 Placement of Image Quality Indicators. The Overview in Williams's SOP states that "The purpose of this Williams procedure is to establish the minimum requirements for Nondestructive Testing (NDT), inspection, and/or evaluation to meet or exceed the NDT requirements as set forth in American Petroleum Institute (API) 1104, latest Pipeline and Hazardous Materials Safety Administration (PHMSA) accepted edition."

API Std. 1104, Section 11, Procedures for Nondestructive Testing, Subsection 11.1.6 Placement of Image Quality Indicators (IQI), paragraph 11.1.6.1 Film, outlines the placement of IQI on films to be interpreted. Paragraph 11.1.6.1 states in part that:

"The IQI shall be placed as follows:

- a. ...When a repaired weld is radiographed, an additional IQI shall be placed across each repaired area."

During the inspection, the PHMSA inspector requested Line C NDT records for any welds which required repair. Transco provided x-ray film and records associated with weld ML-20 and its repair identified as ML-20R.

The PHMSA inspector observed that there was no IQI placed across the repaired area of the weld. Subsequent to PHMSA's identification of the issue, Transco re-radiographed the repaired weld ML-20R with proper IQI placement, as required in API Std. 1104. On September 18, 2014, the PHMSA inspector photographed the original x-ray film for ML-20 and ML-20R, along with the corrected x-ray film for ML-20R depicting proper placement of the IQI across the repaired area within view 84-90.

Therefore, Transco did not meet the requirement in Subsection 11.1.6 Placement of Image Quality Indicators, paragraph 11.1.6.1 Film of API Std. 1104 which it incorporated into its written NDT procedures.

Proposed Civil Penalty

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$205,638 per violation per day the violation persists up to a maximum of \$2,056,380 for a related series of violations. For violations occurring between January 4, 2012 to August 1, 2016, the maximum penalty may not exceed \$200,000 per violation per day, with a maximum penalty not to exceed \$2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed \$100,000 per violation per day, with maximum penalty not to exceed \$1,000,000 for related series of violations. The Compliance Officer has reviewed the circumstances and supporting documentation involved in the above probable violation(s) and has recommended that you be preliminarily assessed a civil penalty of \$39,700 as follows:

<u>Item number</u>	<u>PENALTY</u>
1	\$39,700

Response to this Notice

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. All material submit in response to this enforcement action may be 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). Failure to respond within 30 days of receipt of this Notice 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.

In your correspondence on this matter, please refer to **CPF 1-2016-1009**, and for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Byron Coy, P.E.
 Director, Eastern Region
 Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance*