

2800 Post Oak Boulevard  
P.O. Box 1396  
Houston, Texas 77251-1396



JUNE 9, 2017

**Mr. Robert Burrough, Director**  
**PHMSA Eastern Region**  
**820 Bear Tavern Road Suite 103**  
**West Trenton, NJ, 08628**

**Re: Transcontinental Gas Pipeline Company LLC – Federal OPID 19570**  
**NOA CPF 1-2017-1013M**

Dear Mr. Burrough,

On May 10, 2017, Transco (Williams) received the subject Notice of Amendment. This letter serves as a submittal of Williams draft amended procedures. Enclosed are excerpts of the draft amended procedures with revisions highlighted in yellow; the complete draft policy for NOA Item 2 is enclosed. All revisions are expected to be implemented before July 7<sup>th</sup>, 2017.

Should you have any questions, please do not hesitate to contact me at 713-215-2733.

Thank you

A handwritten signature in black ink, appearing to read "Shane Frasier". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Shane Frasier  
Engineer, Pipeline Safety – Atlantic Gulf

*Enclosures:*



- NOA Item 1: WIMS 70.14.01 Pipeline Repair Table 1
- NOA Item 2: WilsOP 70.16.00 DOT Valve Maintenance
- NOA Item 3: WilsOP 20.06.03 Cathodic Protection Criteria
- NOA Item 4: WilsOP 20.53.04 Insulating flange Testing

**Table 1 – Permanent Repairs for Pipeline Defects**

Defect Type	Available Repair Method						
	Recoat Only	Sanding	Type "A" Sleeve <sup>1</sup>	Type "B" Sleeve	Bolt On Clamp	Composite Reinforced Sleeve	Cut Out
Leaking Defects	Not Permitted	Not Permitted	Not Permitted	Optional	Optional – Consult Asset Integrity	Not Permitted	Preferred method*
Leaking Mechanical (Dresser) Coupling	Repair by tightening, using housing (pumpkin) or cutout.						
Mechanical Equipment Leaks (Valves and Fittings)	Repair in accordance with manufacturer's guidelines, or cut out and replace.						
Metal Loss < 10% Nominal WT	Preferred method	Not Permitted	Optional	Optional	Optional	Optional	Optional
Metal Loss ≥10% & ≤80% Nominal WT & Passes B31G/RSTRENG	Preferred method	Not Permitted	Optional	Optional	Optional	Optional	Optional
Metal Loss ≥10% & <80% Nominal WT & Fails RSTRENG	Not Permitted	Not Permitted	Optional	Optional	Not Permitted	Preferred method	Optional
Metal Loss ≥ 80% of Nominal WT	Not Permitted	Not Permitted	Not Permitted	Optional	Optional – Consult Asset Integrity	Not Permitted	Preferred method


## 1.0. Using the -0.850 Volt Pipe-to-Soil Criteria

Utilize the -0.850 volt (V) Pipe-to-Soil (P/S) criteria as follows:

Responsible Party	Action
<b>Qualified Company or Contract Employee</b>	1.1 Take P/S potentials according to WISOP O&M 20.53.01—Measuring Pipe-to-Soil Potentials when performing the following: <ul style="list-style-type: none"> <li>• Testing spot location</li> <li>• Annual survey according to WISOP O&amp;M 20.07.01—Annual Cathodic Protection Surveys</li> <li>• Low potential areas according to WISOP O&amp;M 20.03.04—Testing Low Potential Areas</li> </ul>
	1.2 Ensure the P/S reading is at least -0.850 volts (V) with reference to a saturated copper-copper sulfate (Cu/CuSO <sub>4</sub> ) reference cell with the protective current applied.
	1.3 Consider any voltage (IR) drops according to WISOP O&M 20.06.02—Methods for IR Drop Correction.
	1.4 Apply the 100 millivolt (mV) shift criteria whenever -0.850 V P/S is not achieved.
	1.5 Collect all test (survey) data and other information as required by the specific procedure to complete the type of survey work or data collection.  <b>NOTE:</b> This may be collected using field notes, manual data collection forms generated by the Corrosion Database PCS), or in a data logger for electronic data gathering.
	1.6 If the polarized potential ( <i>Instant Off</i> ) is less than -1200 mV overprotection possibilities need to be further investigated.  <b>NOTE:</b> Attempt to locate all additional current sources to properly determine polarized potentials. Take into account coating type, pipe specifications and readings to determine if there is a threat to integrity. Use of coupons, close interval survey, smart tools, or other technologies may be warranted for further investigation. If feasible mitigate the over protection by decreasing your rectifier readings.
	1.7 Transfer the data either manually or electronically into PCS.

## 2.0. Potential Testing

The process qualified Company or contract employees use to perform the potential test follows:

Process	
2.1	Take P/S potentials on both the upstream and downstream sides of the insulated flange with the electrode in the same location and with the protective current on.
2.2	<p>Take a voltage (IR) drop from one side of the flange to the other side.</p> <p> <b>NOTES:</b></p> <ul style="list-style-type: none"> <li>This number should approximate the difference between the two P/S potentials taken in the previous step.</li> <li>Perform further testing as outlined in the following processes in this procedure if the IR drop is less than 100 millivolts (mV) regardless of whether both sides meet Cathodic Protection polarization criteria or not.</li> </ul>
2.3	Identify the insulating flange as effective and therefore requires no further testing if the IR drop is more than 100 mV.
2.4	Document flange testing in files, field notes, or PCS.

## Policy 70.16.00.08: "DOT Valve Maintenance"

DOT - 49 CFR 192.745

### 1.0 Policy

1.1 It is the policy of Williams that any line valve required during an emergency be inspected and partially operated to ensure safe and free operation.

1.2 It is the policy that each District maintain a list of DOT valves. The list may exist in Maximo, OMS, or some other electronic or hardcopy version. This list must be reviewed annually.

1.2.1 Depending on the facilities in the District, this list must include all valves that could be utilized during an emergency. This includes but is not limited to:

- Compressor Station Block Valves
- Compressor Station Side Gate Valves
- Compressor Station Blowdown Valves
- Mainline and Lateral Block Valves
- Mainline and Lateral Crossover Valves (between parallel lines)
- Mainline and Lateral Block B1 and B2 Valves (bypass)
- Meter Station Tap Valves
- Automatic ESD Station Fuel Gas Supply Valves
- Offshore Platform Isolation Valves
- Offshore Platform Blowdown Valves
- Storage Well Side Gate Valves
- Meter/Regulator Station Isolation Valves

1.3 It is the policy to conduct maintenance and inspection in accordance with 07.10.322-PMR – VA-V Valve Inspection and Maintenance. Complete form F07-812 – Valve Inspection Report or information can be kept in the Computerized Maintenance Management System (CMMS), i.e. Maximo or OMS, if all the required data is captured.



1.4 Review each submitted F07-812 – Valve Inspection Report for completeness and accuracy. Take prompt remedial action to correct any valve found inoperable, unless an alternative valve can be designated. Document remedial actions taken on the F07-812 Valve Inspection Report.

2.0 Frequency

2.1 The frequency of inspecting and partially operating DOT valves shall be at intervals not exceeding 15 months, but at least once each calendar year.

OMS Number	OMS Description	Frequency
OMS 000099	DOT Valve Maintenance	<u>Annual (Y1)</u>

2.2 The frequency of reviewing the DOT valve list shall be at intervals not exceeding 15 months, but at least once each calendar year.

3.0 Responsibility

3.1 The District Manager is responsible for compliance with this policy throughout their assigned geographic region.

RELATED TOPICS:

Forms	F07-812 – Valve Inspection Report
Policies	N/A
Procedures	07.10.322-PMR – VA-V Valve Inspection and Maintenance