

WARNING LETTER

OVERNIGHT EXPRESS DELIVERY

December 21, 2017

Mark Cluff
VP Safety & Operational Discipline
Transcontinental Gas Pipe Line Company
One Williams Center
Tulsa, OK 74172

CPF 1-2017-1022W

Dear Mr. Cluff:

From May 1-4, 2017, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected Transcontinental Pipe Line Company's (Williams) records and procedures for the Atlantic Sunrise Project in Manassas, VA.

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

1. § 192.229(c) Limitations on welders and welding operators.

(c) A welder or welding operator qualified under § 192.227(a)-

(1) May not weld on pipe to be operated at a pressure that produces a hoop stress of 20 percent or more of SMYS unless within the preceding 6 calendar months the welder or welding operator has had one weld tested and found acceptable under either section 6, section 9, section 12 or Appendix A of API Std 1104 (incorporated by reference, see §192.7). Alternatively, welders or welding operators may maintain an ongoing qualification status by performing welds tested and found acceptable under the above acceptance criteria at least twice each calendar year, but at intervals not exceeding 7 ½ months. A welder or welding operator qualified under an earlier edition of a standard listed in §192.7 of this part may weld, but may not re-qualify under that earlier edition; and...

Williams did not properly requalify two welders on the Atlantic Sunrise Project. Specifically, Williams failed to maintain adequate documentation of two welders to support welder requalification, per the requirements of § 192.229(c) - API Std. 1104 (incorporated by reference §192.7).

During the inspection, the PHMSA inspector reviewed welder qualification records and Williams' "Volume 890 – Construction Specification for ONSHORE PIPELINE CONSTRUCTION (Procedure)." The Procedure, Section 9.1.5 – Welder Qualification stated:

"9.1.5 Company certification duration shall be 6 calendar months. Re-certification shall occur as follows:

- *Requalification may be by radiography if the welder's previous qualification has not expired. A welder may re-qualify indefinitely by radiographic examination as long as that welder's previous qualification has not expired.*
- *Requalification by radiography must involve the same welding process as initial qualification, but may include any grade of pipe, pipe diameter, or wall thickness.*
- *Requalification by radiography may be administered during a welder's current job assignment. The welding inspector shall send a copy of the respective radiographic interpretation report (film reader sheet) and Company welder qualification record to the Company Welding Department in Houston, TX.*
- *The radiographic acceptance standard for welder requalification and for production work shall be API 1104 (latest DOT approved edition) unless otherwise specified by Company"*

Williams provided 2016-2017 welder qualification records, which included Form WGP-0120 WilSOP Welder Qualification Records (WGP-0120), and Form WGP-0149 WilSOP Weld Inspection Film Report (WGP-0149).

The WGP-0120s documented that two welders were destructively qualified under the applicable procedure on September 17, 2016 and/or September 19, 2016 at Station 175. Both welders were subsequently requalified by non-destructive examination (NDE) on November 23, 2016 per the requirements of § 192.229(c)(1) and Williams Procedure.

The WGP-0149s showed the acceptability of the welds under API 1104 Section 9. However, the November 23, 2016 form did not properly identify the welders who performed the qualification welds. Typically, the radiographic interpretation report utilized for welder requalification will include the following information, but not limited to:

- Objective for record keeping purposes
- Welder identification – name and/or last four digits of his social security
- Welder number or an assigned project stencil in order to establish continuity

During the inspection exit meeting and in subsequent follow-up requests, Williams conveyed that it could not provide any documentation directly tying the two welders in question to the requalification welds and/or associated NDE records provided.

Therefore, Williams failed to maintain adequate documentation of two welders to support welder requalification, per the requirements of § 192.229(c) - API Std. 1104.

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$209,002 per violation per day the violation persists, up to a maximum of \$2,090,022 for a related series of violations. For violations occurring prior to November 2, 2015, 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. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item(s) identified in this letter. Failure to do so will result in Transcontinental Pipe Line Company being subject to additional enforcement action.

Please 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).

No reply to this letter is required. If you choose to reply, please submit all correspondence in this matter to Robert Burrough, Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, West Trenton, NJ 08628. Please refer to **CPF 1- 2017-1022W** on each document you submit, and whenever possible provide a signed PDF copy in electronic format. Smaller files may be emailed to robert.burrough@dot.gov. Larger files should be sent on a CD accompanied by the original paper copy to the Eastern Region Office.

Sincerely,

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration