



October 5, 2017

VIA: Electronic Mail & FedEx

Mr. Robert Burrough
Acting Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
US Department of Transportation
820 Bear Tavern Road, Suite 103
Trenton, NJ, 08628

Re: **CPF-1-2017-5024M**
Notice of Amendment

Mr. Burrough,

The Notice of Amendment (NOA) referenced above and dated September 1, 2017 was received by Sunoco Pipeline L.P. (SPLP) on September, 5, 2017. SPLP is a subsidiary of Energy Transfer Partners. This NOA provided SPLP 30 days to respond. SPLP submits with this cover letter, revisions to the SPLP DOT Part 195 Operations and Maintenance Manual Section 420 and Section 432.

The revised procedures (Attachment 1 and 2) address points noted in CPF 1-2017-5024M.

1. Section 420 Valve Maintenance "Notes or Remarks" section was revised to provide examples of what operating conditions the Code 5 may relate to and lists roles and responsibilities for Technicians, Supervisors and Maintenance Planners with regard to further addressing what to do when Code 5 is used. Emphasis is placed on completing the MLV inspection within the intended time window not to exceed 7 ½ months.
2. Section 432 Inspection of In Service Breakout Tanks was revised to identify both Atmospheric / Low Pressure Breakout Tank requirements and Pressurized Breakout Tank requirements. An additional section, *INSPECTION OF PRESSURIZED IN-SERVICE BREAKOUT TANKS* was added to this procedure. The procedure now clearly specifies the API Standards that were 'incorporated by Reference' in 49 CFR 195 which address the inspection requirements for pressure vessels used as DOT Breakout Tanks. The document now identifies specific requirements for Breakout Tanks built to API 2510 or ASME Pressure Vessel codes and includes API STD 510 Section 6 for External, Internal and On-Stream Inspections.

SPLP believes these additions to the DOT 195 Operations and Maintenance Manual should adequately address the findings identified in CPF-1-2017-5024M.

Sincerely,

Ryan Coffey
Executive VP of Operations
Energy Transfer Partners

cc: T. Stamm, T. Nardozi, D. Nichols, J. Wright

Attachment