

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

OVERNIGHT EXPRESS DELIVERY

April 2, 2018

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

CPF 1-2018-1007

Dear Mr. Cluff:

From February 9-13, 2015, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected the Transcontinental Gas Pipe Line Company, a wholly owned subsidiary of Williams Partners L.P. (Williams), Virginia Southside Lateral construction project in South Boston, Virginia.

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

Williams failed to nondestructively test welds in accordance with its written procedures. Specifically, Williams failed to follow its *Procedure 90.09.01 – Nondestructive Testing of Welds*, Rev. 11, 12/31/2012 (Procedure), regarding the number and placement of station markers.

During the inspection, the PHMSA inspector reviewed non-destructive testing (NDT) records for welds completed on the Virginia Southside Lateral Expansion Project, and Williams' Procedure.

The Procedure - Section 5, Film Viewing and Identification, paragraph 5.3 states:

“Ensure the film is identified and viewed per the following requirements:

- Identify film clearly using lead numbers and/or a number belt with markers no more than 6 inches apart. When identifying piping greater than or equal to 10 inch nominal, station markers can be greater than 6 inches, but not exceeding 12 inches...”

Radiographic inspection reports reviewed by the inspector, dated 10/13/2014 and 11/6/2014 (Records), show that:

1. Welds CXR-142 and CXR-154 were nondestructively tested via a Single Wall Exposure/Single Wall View (SWE/SWV) radiographic technique that incorporated two (2) x-ray film strips, each 40 inches in length to capture an image of the entire weld.
 - a. The pipe diameter is 24 inches
 - b. The film observed depicted 2 marker stations designated as 1 (top) and 2 (bottom), identifying two views (1-2, 2-1), which based on calculation would have a marker interval of 37.18 inches in length.
 - c. Since the circumference of 24-inch diameter pipe is approximately 75.4 inches, a minimum of 7 markers are necessary to meet the “not exceeding 12-inches” marker interval requirement stated in the Williams procedure.
2. Weld AXR-10 and AXR-13 were nondestructively tested via a Double Wall Exposure/Single Wall View (DWE/SWV) radiographic technique that incorporated three (3) x-ray film strips, each 30 inches in length to capture an image of the entire weld.
 - a. The pipe diameter is 24 inches
 - b. The film observed depicted 3 marker stations designated as 1, 2 and 3, identifying three views (1-2, 2-3, 3-1), which based on calculation would have a marker interval of 25.12 inches in length.
 - c. Since the circumference of 24-inch diameter pipe is approximately 75.4 inches, a minimum of 7 markers are necessary to meet the “not exceeding 12-inches” marker interval requirement stated in the Williams procedure.

During the inspection, the Williams' regulatory liaison witnessed and noted the weld numbers and film reviewed. Copies of the original x-ray film were unavailable at the time of the inspection.

Therefore, Williams failed to NDT welds in accordance with its written procedures, per the requirement of § 192.243.

Proposed Civil Penalty

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. 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 \$33,700 as follows:

<u>Item number</u>	<u>PENALTY</u>
1	\$33,700

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).

Following the receipt of this Notice, you have 30 days to submit written comments, or request a hearing under 49 CFR § 190.211. 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 you are responding to this Notice, we propose that you submit your correspondence to my office within 30 days from the receipt of this Notice. This period may be extended by written request for good cause.

Please submit all correspondence in this matter to Robert Burrough, Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, West Trenton, New Jersey 08628. Please refer to **CPF 1-2018-1007** 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.

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,

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

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