U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628
609.771.7800

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

July 22, 2019

Mr. Brian Sheppard
VP, Pipeline Operations
Dominion Energy Transmission, Inc.
925 Whiteoaks Boulevard
Bridgeport, WV 26330

CPF 1-2019-1010M

Dear Mr. Sheppard:

From October 16 – 18, 2018, a representative from the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code (U.S.C.), inspected Dominion Energy Transmission, Inc.'s (Dominion) procedures for welding in Loudoun County, Virginia.

On the basis of the inspection, PHMSA has identified the apparent inadequacy found within Dominion's plans or procedures, as described below:

1. § 192.225 Welding procedures.

(a) Welding must be performed by a qualified welder or welding operator in accordance with welding procedures qualified under section 5, section 12, Appendix A or Appendix B of API Std 1104 (incorporated by reference, see § 192.7) or section IX of the ASME Boiler and Pressure Vessel Code (ASME BPVC) (incorporated by reference, see § 192.7) to produce welds meeting the requirements of this subpart. The quality of the test welds used to qualify welding procedures must be determined by destructive testing in accordance with the applicable welding standard(s).

Dominion's welding procedures qualified under section 5 of API Std 1104 were inadequate. Specifically, Dominion's Weld Procedure DT-312SC-WOL 04/01/07 Rev.: 0 and DT-322SC-WOL 04/01/07 Rev.: 0 (Procedures) did not designate the maximum time between the completion of the root pass and hot pass, and the hot pass and 3rd pass, as required by section 5 of API Standard 1104 – Welding of Pipelines and Related Facilities, 20th Edition (API 1104).

API 1104, Section 5.3.2.10 states:

> "The maximum time between the completion of the root bead and the start of the second bead, as well as the maximum time between the completion of the second bead and the start of other beads, shall be designated."

On January 15, 2016, API issued a technical interpretation clarifying the intent of Section 5.3.2.10 of API 1104 20th Edition, which stated "Yes, the intent of API 1104, Section 5.3.2.10 is to identify the maximum time between the 1st pass and 2nd pass and the maximum time between the 2nd pass and 3rd pass."

During the inspection, the Procedures were reviewed. The Procedures stated under Time Between Passes, "All passes for Fittings shall be completed without delay." Therefore, DETI's Procedures failed to designate the time between weld passes as required by section 5 of API 1104, referenced in § 192.225(a).

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. 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. 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).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §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 an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 60 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Dominion Energy Transmission, Inc. maintain documentation

of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Robert Burrough, Director, PHMSA Eastern Region, 840 Bear Tavern Road, Suite 300, West Trenton, NJ 08628. Please refer to **CPF 1-2019-1010M** 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 USB flash drive 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*