

June 9, 2020

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Division
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

Re: Niagara Mohawk Power Corporation (Niagara) Liquefied Natural Gas (LNG) Facility
in Providence, RI. **CPF 1-2020-002-NOA**

Dear Mr. Burrough:

On May 12, 2020, the Pipeline and Hazardous Materials Safety Division (“PHMSA”) of the U.S. Department of Transportation issued a Notice of Amendment (“NOA”) to Niagara Mohawk Power Corporation (“Niagara” or the “Company”). The NOA relates to an apparent inadequacy found within Niagara's plans or procedures observed during PHMSA’s inspection of the Niagara liquefied natural gas plant in Providence, Rhode Island between February 4 and February 6, 2020. The issue, as stated in the NOA, is described below:

1. § 193.2605 Maintenance procedures.

(a) ...

(b) Each operator shall follow one or more manuals of written procedures for the maintenance of each component, including any required corrosion control. The procedures must include:

(1) The details of the inspections or tests determined under paragraph (a) of this section and their frequency of performance; and

Niagara's maintenance procedures were inadequate. Specifically, Niagara's *G-II Standard for Corrosion Control at LNG Plants, Rev 5* and *G-12 Corrosion Control Evaluation Policy for LNG Plants, Rev 4* (Procedures), and its other procedures relative to training, failed to define what experience and training is necessary to qualify a person in corrosion control technology in accordance with § 193.2707(c).

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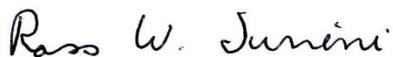
Niagara's Response to the Notice of Amendment

The Company agrees to make the necessary changes to its procedures. I have attached a revision (Rev. 6) to Niagara's Policy G-11 *Standard for Corrosion Control at LNG Plants*, which adds a new section titled "Corrosion Control Training & Qualification." This new section defines the experience and training required to qualify a person in corrosion control. Policies G-11 and G-12 are related and must be read in conjunction with each other. Policy G-II establishes standards for training and experience required by personnel to perform all corrosion control activities. Policy G-12 addresses just one of these activities – corrosion control evaluation procedures. By amending G-11 to include the level of training and experience required for personnel performing all corrosion control activities, these standards would be applied to the corrosion control evaluation activities described in G-12. In addition, for completeness, I have attached the two documents referenced in the new section of G-11: (1) Gas Work Method GEN01100: Operator Qualification Plan (Rev 4); and (2) Gas Policy COR02100: Corrosion Inspection and Repair (Rev. 08/15/2018).

The Company is happy to answer any questions you may have with regard to these changes.

Thank you for your kind attention to this matter.

Sincerely,



Ross Turrini

SVP, Gas Process and Chief Engineer

Cc: Badar Khan, President, National Grid USA
Cordelia O'Hara, Chief Operating Officer, Gas Operations