

Kirk Hayden
Manager, LNG Operations
Eversource Energy

June 26, 2020

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

RE: CPF 1-2020-3002M- Notice of Amendment

Dear Mr. Burrough:

From May 7, 2019 to May 9, 2019, a representative (“Representative”) of the Pipeline and Hazardous Materials Safety Administration (“PHMSA” or the “Administration”) pursuant to Chapter 601 of 49 United States Code (U.S.C.) performed a construction inspection of the Hopkinton LNG facility (“Hopkinton” or “Facility”) located at 52 Wilson Street, Hopkinton. Hopkinton is owned by Hopkinton LNG Corp. (“Company”), a wholly-owned indirect subsidiary of Eversource Energy. The inspection included a review of Hopkinton’s Liquefier Project. On June 16, 2020, the Administration issued a Notice of Amendment (“Notice”) setting forth its findings that the Facility had an apparent inadequacy within its plans or procedures. The information provided below constitutes the Company’s response to the Administration’s Notice.

Administration’s Finding

§ 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) ...

(2) A description of other actions necessary to maintain the LNG plant according to the requirements of this subpart.

The Notice stated that Hopkinton LNG's written procedures for the maintenance of each component were inadequate. Specifically, the Notice stated that Hopkinton LNG's procedures 3.3 External Corrosion Control and 3.5 Internal Corrosion Control failed to adequately address the requirements of § 193.2605(b)(2) as it pertains to § 193.2637.

Section 193.2637 states:

Prompt corrective or remedial action must be taken whenever an operator learns by inspection or otherwise that atmospheric, external, or internal corrosion is not controlled as required by this subpart.

During the inspection, a PHMSA inspector reviewed Hopkinton LNG's procedure 3.3 *External Corrosion Control*, Section N, which stated in part "Take prompt corrective or remedial action for

any deficiency in external corrosion protection discovered as a result of any test survey or inspection." The inspector also reviewed Hopkinton LNG's procedure 3.5 *Internal Corrosion Control*, Section F, which stated in part "Take prompt corrective or remedial action for any deficiency in internal corrosion protection discovered as a result of any test, survey, or inspection." These two procedures used the phrase "prompt corrective or remedial action," but failed to provide a description of the necessary actions as required by § 193.2605(b)(2). Specifically, corrosion being a time dependent treat, the procedures lacked a description of actions that include a timeframe for remediation of corrosion control deficiencies.

The Notice stated that, thus, Hopkinton LNG's written procedures for maintenance as required by § 193.2605 were inadequate as it pertains to § 193.2637.

Company's Response: As discussed with the Representative during the inspection, it is the Company's practice to complete corrective or remedial action for any deficiency in external and internal corrosion protection discovered as a result of any test, survey, or inspection as soon as possible and in no event beyond the next inspection. This is the Company's interpretation of § 193.2637.

Although the Company is in compliance with 49 CFR 193.2605 and 193.2637, following the inspection, the Company revised the Maintenance Manual-Sections 3.3- "*External Corrosion Control*" and 3.5- "*Internal Corrosion Control*" to clearly state a remedial action timeframe. The Company organized and conducted a Skype call with the Representative on May 22, 2019, to review the proposed changes. During the call, the Representative verbally approved the changes. The revised procedure was then made permanent on June 12, 2019. On May 28, 2019, per the Representative's request, the Company submitted a copy of the corrosion procedure that was in place at the time of inspection.

The Company is now providing a copy of the revised procedure with this response for the Administration's review (see Attachment A). The document – shown in clean and redlined format marked against the procedure in place at the time of inspection – is submitted in accordance with the Administration's guidelines for labelling controlled unclassified information.

The Company appreciates the opportunity to respond to the Administration's findings set forth in the Notice. The safe and reliable operation of the Facility is of singular, paramount importance. In this response, the Company has demonstrated its proactive action to further improve Facility procedures in response to the discussions during the inspection, and its compliance with 49 CFR 193.2605 and 193.2637.

Sincerely,



Kirk Hayden
Manager, LNG Operations
Eversource Energy