



Norfolk Southern Corporation
Law Department
Three Commercial Place
Norfolk, Virginia 23510-9241

A. Gayle Jordan
General Solicitor - Environmental

Writer's Direct Dial Number

(757) 629-2814
(757) 629-2607 (Fax)

VIA REGULAR MAIL & E-MAIL
(fax) 404-832-1169 .Wayne.Lemoui@dot.gov

April 7, 2011

Mr. Wayne T. Lemoi
Director, PHMSA Pipeline Safety, Southern Region
233 Peachtree St. NE, Suite 600
Atlanta, GA 30303

Re: CPF 2-2011-6001M

Dear Mr. Lemoi:

With this letter, Norfolk Southern Railway Company ("Norfolk Southern") submits its second response to the January 5, 2011 Notice of Amendment ("NOA"). The NOA cites Norfolk Southern for certain deficiencies in its Operations, Maintenance, and Emergencies ("OM&E") procedure manual. Attached to this letter (via email and US Mail), Norfolk Southern hereby submits its amended OM&E manual, as requested in the NOA. To facilitate your review of the revised plans, we are also providing a table that cross-references the items in the NOA with the respective revisions.

Norfolk Southern has expended considerable resources and effort in making the requested changes to the manual to achieve compliance with Department of Transportation ("DOT") regulations. The amended manuals are intended to comply with the requirements in every respect. While we anticipate that the changes made to the manual will be satisfactory, Norfolk Southern welcomes any further comments DOT has with regard to the manuals and will, of course, be willing to address any further comments that DOT may have.

Sincerely,



A. Gayle Jordan

Enclosure

RECEIVED APR 13 2011

W.T. Lemoi

4/7/11

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cc: Brian Maclean
Russ McDaniel
Casey Hopkins, Esq.
Chris Foley

Norfolk Southern NOA Cross Reference

NOA Number	Concerning	Location in Plan
1	195.52 - Telephonic Reporting of Accidents – Identify all the events requiring that NSR determined to be significant that do not meet other criteria of 195.52 and / or events resulting in the pollution of any stream, lake, reservoir, or other similar body of water that violated applicable water quality standards, caused a discoloration of the surface of the water or adjoining shoreline, or deposited a sludge or emulsion beneath the surface of the water	Accident Reporting Page 10
	Did not identify the information to be included in the telephonic reports to the NRC	Accident Reporting Page 11
2	195.54 - Accident Reports – Did not require that an accident report be submitted not later than 30 days after discovery of an accident or that a supplemental report be filed when NSC received any changes in the information reported or any additional information not included in the original report.	Accident Reporting Page 12
3	195.55 - Reporting Safety Related Conditions – Did not require Personnel to observe and report safety related conditions (SRC) nor did they properly define what is an SRC and which SRCs are required to be reported.	Hazard Recognition page 29
4	195.56 - Filing Safety-related Condition Reports – Did not address the time limits for reporting, the method to report the SRC and the information to be reported on SRCs	Filing Safety Related Condition Reports page 30
5	195.120 - Passage of Internal Inspection Devices – Did not contain any requirements that newly constructed pipelines, and pipeline sections where line pipe, valves, fittings, or other line components are replaced, be designed and constructed to accommodate the passage of internal inspection devices.	Appendix G Inspection Requirements for Pipeline Repairs page 32
6	195,402(c)(4) - Determining which pipeline facilities are located in areas that would require an immediate response by the operator – Did not explain that areas on the pipeline that would require an immediate response nor did the procedures identify other areas that would require an immediate response	Facilities in hazardous Areas page 14
7	195,402(c)(10) - Abandoning pipeline facilities – Did not include procedures to follow for purging, disconnecting, and sealing pipeline facilities to be abandoned.	Pipeline Abandonment page 15 and Appendix C

8.	195.402(c)(13) - Periodically reviewing the work done by operator-personnel to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action	Operator Review page 16
9	195.402(c)(14) –Did not address protecting personnel in excavated trenches from unsafe accumulations or vapor or gas, nor making available rescue equipment	Trench Safety page 16 and Appendix D
10	195.406 – Did not identify how the MOP was determined	Maximum Operating Pressure page 19 and Appendix F
	Procedure did not cover how NSC would provide adequate controls to prevent the pressure from exceeding 110% of the MOP during surges and other variations from normal operations	Appendix F page 7
11	195.422 – Did not address hoe repairs would actually be made or how regulatory requirements of Part 195 Subpart D for construction, inspection, welding, welder qualification, and nondestructive examination or Subpart E pressure testing when making repairs would be met	Pipeline Repairs page 21 and Appendix G
12	195.428 – Did not address the requirements that the pressure switches used to protect NSC’s pipeline be tested	Over Pressure Safety Devices and Overfill Protection Systems page 22
13	195.442 – Did not develop a damage prevention program	Damage Prevention Program page 23 and Appendix H
14	195.555 – Did not address having supervisors maintain a through knowledge of the corrosion control procedures for which they were responsible for insuring compliance	Appendix I page 6
15	195.557 - Did not have procedures addressing the requirement to coat pipelines for external corrosion control	Appendix I page 7
16	195.559 – Did not have procedures addressing the requirements for pipeline coating materials	Appendix I page 10
17	195.561 – Did not have procedures addressing the requirements to inspect external pipeline coatings before lowering a pipe in a ditch and to repair any coating damage found	Appendix I page 11
18	195.563 – Did not address the requirements to have a cathodic protection system to protect the pipeline	Appendix I page 7
19	195.567 – NSC procedures did not address the installation and maintenance of test leads	Appendix I page 9 and 19
20	195.569 – Inadequate because they did not require that the pipeline be examined circumferentially and longitudinally beyond the exposed portion whenever external corrosion is found requiring corrective action	Appendix G Pipeline Examinations page 25

21	195.571 – Did not address the criteria used to determine that cathodic protection on the pipeline is adequate	Appendix I page 13
22	195.573 – Did not address the circumstances when NSC would determine that a close-interval survey or comparable technology is practicable and necessary to accomplish the objectives of paragraph 10.1.1.3 of NACE SP 0169	Appendix I page 15 and 20
23	195.575 – Did not address electrically isolating the pipeline and what inspections and tests and safeguards are required	Appendix I page 8 and 17
24	195.579 – Did not require investigating beyond the removed pipe for internal corrosion when localized corrosion pitting is found	Appendix G Pipeline Examinations page 25
25	195.581 – Did not include an atmospheric corrosion control program identifying which pipeline must be protected against atmospheric corrosion and what coating materials may be used	Appendix I page 28
26	195.583 – Did not include an atmospheric corrosion control program identifying inspection for atmospheric corrosion, their frequency, and actions to be taken if atmospheric corrosion is found	Appendix I page 6 and 28
27	195.585 – NSC procedures do not address actions to take if corroded pipe is found	Appendix I page 23, 26, 27, 35
28	195.587 – Did not include methods used to determine the strength of corroded pipe	Appendix I page 23 and 27
29	195.589 – Did not identify the corrosion control records to be maintained	Appendix I page 36