



5151 San Felipe, Suite 2500
Houston, TX 77056

Direct: 713.331.7434
Fax: 713.331.7456
czamarin@nisource.com

Chad Zamarin
Director – Integrity Management

June 30, 2009

R. M. Seeley
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
8701 South Gessner Road, Suite 1110
Houston, TX 77074

RE: Response to Notice of Amendment, CPF 4-2009-1014M

Dear Mr. Seeley:

This letter is provided on behalf of the NiSource Gas Transmission and Storage Companies (NGT&S), specifically Columbia Gas Transmission, LLC, in response to Notice of Amendment, CPF 4-2009-1014M ("NOA"), which was dated May 22, 2009, and received by NGT&S on June 1, 2009.

In accordance with Section II.a of the Response Options for Pipeline Operators in Compliance Proceedings provided with the NOA, NGT&S submits this response letter to notify you of NGT&S's plans to address the items identified in the NOA.

The amended OQ Plan and any supporting material will be submitted to you within 60 days of receiving the notice, which corresponds to July 31, 2009, as proposed on Page 3 of the NOA. Plans for addressing the individual items noted in the NOA are outlined below, with the language from the NOA in bold and followed by a brief description of the NGT&S plan for resolving the respective item.

Item 1 of the NOA refers to §192.805(c) and states the following:

CGT must make provision for languages other than English for effective communication of directions and reactions to AOCs to unqualified individuals who speak and comprehend languages other than English.

NGT&S Response:

NGT&S will implement a plan for making available instructions, procedures, and other necessary communications to individuals who speak and comprehend languages other than English. This will be implemented as a general plan to support the broad issue of non-English fluency among employees and contractors performing work for NGT&S. This plan will be incorporated by reference into the OQ Plan.

Item 2 of the NOA refers to §192.805(d) and states the following:

CGT must amend its OQ Plan to include provisions for review of an individual's performance of a covered task as part of the incident/accident review process.

NGT&S Response:

The NGT&S Root Cause Analysis Process, Procedure 220.004.002, will be updated to require evaluation of whether performance of an OQ task contributed to an incident/accident. If performance of an OQ task is found to have contributed, corrective action(s) as outlined in the OQ plan will be implemented.

Item 3 of the NOA refers to §192.805(f) and states the following:

CGT must amend the OQ Plan to include Management of Change procedures to ensure that such changes are identified and incorporated in CGT's Plan, and communicated to the individuals, including contractor individuals, and how such changes will be implemented in the program. Communication should include back communication to third party qualification providers to identify if contract employees have been involved in incidents on other jobs.

NGT&S Response:

NGT&S will confirm with third party qualification providers that communication requirements are in place regarding contractors involved in incidents. In addition, NGT&S will add a process to the OQ Plan for "Communication of Changes" to individuals, including contractors. NGT&S will also add to its OQ Plan requirements for periodic review, update, and communication of changes to the OQ Plan.

Item 4 of the NOA refers to 192.807 and states the following:

CGT's Plan should identify all abnormal operating conditions (AOCs) that would be reasonably recognizable by an individual performing a covered task, whether it is specific to that task or general in nature, which may be encountered in the performance of a covered task. General AOCs were not included as part of the welding qualification tasks. Further, demonstration of recognition of general AOCs and task specific AOCs must be included in the Plan.

NGT&S Response:

A specific task will be developed for demonstrating recognition of General AOC's and will be required for qualification of all individuals performing covered tasks. A task will also be created to qualify welders for AOC'S specific to the welding processes, and AOC's for welding will be added to each welding procedure.

If you have any questions regarding NGT&S's plan for addressing the items identified in the NOA, please feel free to contact me.

Sincerely,



Chad Zamarin
Director – Integrity Management
NiSource Gas Transmission & Storage
5151 San Felipe, Suite 2500
Houston, TX 77056
713-331-7434 ofc
713-331-7456 fax
czamarin@nisource.com