

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 25, 2012

Mr. William Cope
Vice President Eastern Operations
Tennessee Gas Pipeline Company
569 Brookwood Center, Suite 501
Birmingham, AL 35209

CPF 4-2012-1006M

Dear Mr. Cope:

During March 2 - 11, 2011 and October 17 - 21, 2011, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Tennessee Gas Pipeline Company (TGPL) Gas procedures for Compressor Operation Policies in Cleveland, Texas and Natchitoches, Louisiana.

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

1. §192.225 Welding Procedures.

(a) Welding must be performed by a qualified welder in accordance with welding procedures qualified under section 5 of API 1104 (incorporated by reference, see §192.7) or section IX of the ASME Boiler and Pressure Vessel Code "Welding and Brazing Qualifications" (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 shall be determined by destructive testing in accordance with the applicable welding standard(s).

(b) Each welding procedure must be recorded in detail, including the results of the qualifying tests. This record must be retained and followed whenever the procedure is used.

TGPL Welding Manual and the Welding Procedure Specifications are found inadequate.

A. TGPL Welding Manual, General Welding Requirements, Section WM020, Sub Section 2.d. states “Proficiency welds made using low hydrogen electrodes will also extend the welder’s qualifications for cellulosic electrodes, if any.”

API 1104 (19th Edition), Section 6.2.2C states: a welder who has successfully completed the qualification test described in 6.2.1 shall be qualified within the limits of the essential variables described below. If any of the following essential variables are changed, the welder using the new procedure shall be requalified:

c. A change of filler-metal classification from Group 1 or 2 to Group 3, or from Group 3 to Group 1 or 2 (see Table 1).

TGPL must amend its Welding Manual to ensure it address the requirement of essential variables

B. TGPL Welding Manual, Welding Procedure Specification (API 1104 19th Edition) numbers A221A and A221A-F indicate number of beads will vary with wall thickness.

API 1104 (19th Edition), Section 5.3.2.5 states “the sizes and classification number of the filler metal and the minimum number and sequence of beads shall be designated.”

TGPL must amend its Welding Procedure Specification to ensure that procedure addresses the requirement of essential minimum number of beads.

C. TGPL Welding Manual, Welding Procedure Specification (API 1104 19th Edition) numbers A221A and A221A-F covers material grade (yield in psi) 42,000 and less, Over 42,000 to 60,000, 65,000 and 70,000.

API 1104 (19th Edition), Section 5.4.2.2 states:

A change in base material constitutes an essential variable. When welding materials of two separate material groups, the procedure for the higher strength group shall be used. For the purposes of this standard, all materials shall be grouped as follows:

a. Specified minimum yield strength less than or equal to 42,000 psi (290 MPa).

b. Specified minimum yield strength greater than 42,000 psi (290 MPa) but less than 65,000 psi (448 MPa).

c. For materials with specified minimum yield strength greater than or equal to 65,000 psi (448 MPa), each grade shall receive a separate qualification test.

At the time of the inspection, TGPL failed to provide a separate Welding Procedure Specification for the aforementioned material group. TGPL must revise their specification for each group listed above.

2. §192.605 Procedural manual for operations, maintenance, and emergencies

(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(6) Maintaining compressor stations, including provisions for isolating units or sections of pipe and for purging before returning to service.

TGPL Compressor Operation and Procedure (COPP) Manual was found outdated as it cross referenced another technical reference which no longer exists.

TGPL COPP Manual Section 304.1: Protective Device Checks – Electric Motor Drivers references O&M Procedure 302: Pressure Control and Overpressure Protection and COPP 801: Long Term Equipment Preservation. The technical reference COPP 801 was removed on May 12, 2010.

3. §192.615 Emergency plans.

(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:

(3) Prompt and effective response to a notice of each type of emergency, including the following:

(i) Gas detected inside or near a building.

TGPL Emergency Operating Procedure was found inadequate because it did not provide instructions on emergency response for compressor station with gas detectors and no automatic shutdown.

While reviewing Gas Detected Inside or Near a Building or a Pipeline Leak section listed in TGPL's Emergency Operating Procedure, it was found that this section provides instruction on emergency response for station without gas detectors and automatic shutdown as well as for station with gas detectors and automatic shutdown systems.

During the field audit, the PHMSA inspector learned Compressor station 40, building "A" located in Natchitoches, Louisiana is equipped with gas detectors. "A" Building provides 2 intermittent horn blasts at 20% and three at 40% of the lower explosive limit and warn persons about to enter the building and persons inside the building of the danger. Gas detection inside the "A" building will not cause an automatic shutdown.

TGPL must amend its Emergency Operating Procedure regarding Gas detected inside or near a building or a pipeline leak section to ensure that procedure adequately document the requirements for station with gas detectors and without automatic shutdown.

4. §192.615 Emergency plans.

(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:

(4) The availability of personnel, equipment, tools, and materials, as needed at the scene of an emergency.

TGPL Emergency Operating procedure was found inadequate because it failed to provide instruction and training requirements for the contract operators to respond to an emergency.

During the field portion of the audit of Natchitoches unit area, the PHMSA inspector learned compressor station 40 "A" building has been operated by the contract operator. When documentation on training records for contract operator were requested, TGPL provided covered tasks qualification for the two operators. TGPL did not provide records indicating these two employees were trained on company's emergency plan. Instead, TGPL provided directive on response to 40"A" Building Gas Detection which states:

- 1) At 20% LEL Alarm, identify area of building indicating alarm and investigate.
- 2) At 40% LEL Alarm, leave compressor building/DO NOT ENTER and initiate a station ESD.
- 3) Immediately notify supervisor of an ESD activation, and began the investigation, solution, and the reversal procedures found in the EOP.

Based on directive, it appears that contract operators are responding to an emergency. TGPL informed PHMSA, all plant personal and contract operators are trained on emergencies. However, the company could not produce training documentation for the contract operators at the time of the inspection. While the audit was in-progress, TGPL area manager revised the directive to contract operators, which now states:

"At 20% and 40% LEL Alarm, do not attempt to reenter the building until cleared by Company personnel who will perform a planned investigation."

TGPL must amend its Emergency Operating Procedure to ensure that procedure adequately address the role of contract operator and their training requirement.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. 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). 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 a Final Order.

If, after opportunity for a hearing, 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. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 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 Tennessee Gas Pipeline Company maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to R. M. Seeley, Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 4-2012-1006M** and, for each document you submit, please provide a copy in electronic format whenever possible.

In regard to Item 2 listed above, Tennessee Gas Pipeline Company updated COPP manual on April 30, 2011 and submitted via email to PHMSA on May 18, 2011. After considering the material provided, PHMSA deemed the modifications to be adequate.

Sincerely,

R. M. Seeley
Director, Southwest Region
Pipeline and Hazardous Materials
Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*