



P O Box 196660

ANCHORAGE, ALASKA 99519-6660

TELEPHONE (907) 787-8700

Michael W. Joynor  
Senior VP Operations

January 13, 2012

Government Letter No.: 25049  
File No. 2.11

Dennis Hinnah  
Deputy Director, Western Region  
U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
188 W. Northern Lights Blvd., Suite 520  
Anchorage, Alaska 99503

01-17-12P12:49 RCVD

Subject: **CPF 5-2011-5021W**  
**Response to Warning Letter**

Dear Mr. Hinnah,

Alyeska Pipeline Service Company (Alyeska) provides this letter in response to the Pipeline and Hazardous Materials Safety Administration's (PHMSA) warning letter, CPF 5-2011-5021W dated December 14, 2011. The warning letter addresses PHMSA's 2011 inspection of Alyeska's pipeline segment between Milepost 367 and Milepost 496, including Pump Stations 7 & 8.

1. PHMSA states that Alyeska appears to have committed a probable violation of 49 CFR §195.452(j)(2) by failing to include the barrel sleeve at Mile Post 457.53 in its evaluation and assessment process, although PHMSA has decided not to conduct additional enforcement action or penalty assessment.

Alyeska has added inspection of the barrel sleeve at Mile Post 457.53 to the scope of work for the 2012 Mainline Integrity Investigations program. Full inspection of the total circumference of the entire sleeve will be performed, including ultrasonic measurement and inspection for stress corrosion cracking. This will allow evaluation of the condition of the sleeve, and the presence of any internal and external corrosion and cracking. The results of the inspection will help determine the requirements for subsequent inspection and/or repairs.

2. PHMSA states that Alyeska appears to have committed a probable violation of 49 CFR §195.579(b)(2) by placement of corrosion coupons on high points in the dead leg relief piping at Pump Station 7, but not the low points, although PHMSA has decided not to conduct additional enforcement action or penalty assessment.

The coupons installed in the 36 inch relief piping at Pump Station 7 (PS07) are installed at high points and may not reflect conditions of the below ground segments of this dead leg piping. Alyeska completed a risk assessment on dead leg, low and intermittent flow, and concrete encased piping in 2011. The 36 inch relief piping at PS07 was evaluated as part of that process. . As a result, on November 9, 2011, Alyeska developed a project to evaluate whether the relief piping at PS07 can be taken out of service and drained of fluid. As part of that project, Alyeska is currently assessing if and when the piping can be taken out of service, and what form of inspection will be necessary.

Please contact Joseph Robertson at 907-787-8061 if you need additional information or have any questions.

Sincerely,



cc: Chris Hoidal, Director, PHMSA Western Region