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October 5, 2017

Ms. Kim West
Acting Director, Western Region
Pipeline Hazardous Material Safety Administration
12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

CPF 5-2017-0014M

Dear Ms. West

Titan Alaska LNG, LLC (Titan) provides the following in response to PHMSA Notice of Amendment referenced above.

1. **§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.**
 - (1) **Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.**

While reviewing Titan's documentation for the annual inspection of transmission valves, it became evident that the valve maintenance procedures were not adequate to comply with 192.605(b)(1). Maintenance and operation procedures to ensure proper inspection and maintenance of transmission valves are required by Subpart M, §192.745. Procedures must ensure the valves that might be required during an emergency are inspected and partially operated. Inspection and maintenance tasks defined by these revised procedures must be recorded per 192.603(b).

Response

Titan's procedures (SOP 4210, Rev 003, Effective Date 11/1/13, attached) states that the relief, manual isolation, and emergency shutdown (ESD) valves will be inspected and tested once per year not to exceed 15 months by a qualified operator.

Titan's has reviewed its records (attached) and believes it's inspection and maintenance of the valves was adequate and did include exercising the valve as shown in the attached record.

2. **§192.805(b) Qualification program.**

Each operator shall have and follow a written qualification program. The program shall include provisions to:

(a) Identify covered tasks;

(b) Ensure through evaluation that individuals performing covered tasks are qualified;

During the records review for both valve maintenance and corrosion control, it became evident that the valve inspection and maintenance tasks, and painting tasks were not currently covered in Titan's Operator Qualification (OQ) procedures as required by 192.805. Both Valve Inspection and Maintenance as well as Painting/Coatings application meet the requirements of covered tasks and should be included in your OQ procedures.

Response

Titan acknowledges their plan (SOP 3101, Plan of Initial and Continuing Instruction for Plant Operators, Rev 005, Effective Date 11/14/13) did not include training on Transmission Line valve inspection, maintenance, and painting tasks. Titan has revised SOP, (SOP 3101, Plan of Initial and Continuing Instruction for Plant Operators, Rev 006, Effective Date 09/25/17) to include these tasks. The revised SOP 3101 is attached.

Titan has revised (SOP 4205, Transmission Line and LNG Plant Corrosion Protection and Inspection, Rev 004, Effective Date 04/12/17, attached) to state that "All coating applications performed on the Titan Transmission line will be carried out by or under the direct supervision of a person qualified in pipeline coating application". This will ensure through evaluation that individuals performing covered tasks are qualified.

Titan has implemented a new qualification for inspection and maintenance of transmission line valves (Transmission Line Valve Inspection Qualification, attached). This will ensure through evaluation that individuals performing covered tasks are qualified.

Sincerely,



James Branch, Plant Manager

Titan Alaska LNG, LLC

Attachments:

SOP 4210 Transmission Line Valve Inspections (Rev 003)

SOP 3101 Plan of Initial and Continuing Instruction for Plant Operators (Rev 006)

SOP 4205 Transmission Line and LNG Plant Corrosion Protection and Inspection (Rev 004)

Transmission Line Valve Inspection Qualification, 4-12-2017

Transmission Line Valve Inspection 2016

Transmission Line Valve Inspection 2017