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BY:



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April 4, 2018

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

2017 Alaska Pipeline Company Anchorage Transmission PHMSA Audit

RE: Notice of Amendment Response CPF 5-2018-0004M

Mrs. West,

In response to your letter to Mr. John Sims dated March 16, 2018 and received on March 23, 2018, ENSTAR respectfully submits the following response.

On the basis of the inspection, PHMSA identified an alleged inadequacy in ENSTAR's procedures, as described below:

Item 1

§192.241 Inspection and test of welds.

(a) Visual inspection of welding must be conducted by an individual qualified by appropriate training and experience...

The APC Standard Operating Procedure Manual number 2301, Revision No. 12, Section VI (A) does not specify what level of training and experience is required of the individual qualified to complete weld inspection tasks.

PHMSA Allegations

ENSTAR's SOP 2301 Welding Procedures did not state the training and experience level required to visually inspect test welds performed as specified by API 1104 and by 49 CFR, Part 192, Subpart E, § 192.241.

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ENSTAR's Actions Taken

The concerns and recommendations PHMSA expressed during the integrated audit were taken into account and ENSTAR began discussing the revision of its Standard Operating Procedures before the audit had concluded. On March 30, 2018, ENSTAR published a revision to SOP 2301 titled "Welding Procedures" to include the recommendations by PHMSA. Below is an excerpt of SOP 2301, as revised:

Procedure:

VI. Inspection and Testing of Welds

- A. Visual inspection of welding shall be conducted by an individual that has completed operator qualification training and has a minimum of 5 years of related experience or company approved training/certification. All welds must be visually inspected to insure that the welding is performed in accordance with ENSTAR's qualified Welding Procedure Specification. The weld must be deemed acceptable according to API 1104, Section 9. However, if a girth weld is unacceptable under those standards for a reason other than a crack, and if the Appendix A to API 1104 applies to the weld, the acceptability of the weld may be further determined under that Appendix A.

We have included SOP 2301 in its entirety as attachment A.

Should you have any questions regarding our response, please feel free to call me at 907-334-7730 between 8:00 AM and 5:00 PM AST.

Sincerely
ENSTAR Natural Gas Company



Steve Cooper, P.E.
Director of Operations
Steve.Cooper@EnstarNaturalGas.com

Cc: John Sims
John Lau

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