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Dominion Energy

September 20, 2018

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

Re: Response to Notice of Amendment CPF 5-2018-1007M.

Dear Ms. West:

Dominion Energy Questar Pipeline, LLC. (DEQP), OPID No. 12874, has addressed the items and recommendation from the Notice of Amendment letter to remediate the procedural issues identified by the Western Region inspection team.

The following table has the numbered issue identified during the inspection corresponding to the document that was modified. Each of these documents is attached with this correspondence.

Issue	DEQP Procedure
1	Standard Practice 3-75-02
2	Standard Practices 7-00-01 and 7-35-01
3	Standard Practice 4-00-01
4	Standard Practice 3-90-01
5	Standard Practice 5-00-07
Recommendation	Standard Practice 5-01-00

1. *§192.605 Procedural manual for operations, maintenance, and emergencies.*
   (a) …
   (b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for 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.

DEQP's O&M did not have adequate procedures for operating, maintaining, and repairing the pipeline in accordance with § 192.736(c). Specifically, DEQP did not have procedures for maintaining each gas detection and alarm system required by Section 192.736 to ensure they were functioning properly. At the time of inspection, DEQP did not have detailed procedures for gas detector and flame detector equipment maintenance (including inspection and calibration) to ensure they were functioning properly.

DEQP Response:
Detailed procedures for gas detection inspection and calibration have been established in Standard Practice 3-75-02, "Flame and Gas (Fixed) Detector Calibration and Maintenance." This standard practice was adopted by DEQP and published on 30 March 2018. A copy of this standard has been included with this transmittal; please see SP 3-75-02 P 00.pdf.

2. *§192.605 Procedural manual for operations, maintenance, and emergencies.*
   (a) ...
   (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.
   (2) Controlling corrosion in accordance with the operations and maintenance requirements of subpart I of this part.

DEQP's O&M did not have adequate procedures for corrosion control in accordance with § 192.479. Although DEQP has procedures for atmospheric corrosion control in Section 18.1 of SP 7-00-01, that procedure states that "[each aboveground pipeline or portion of a pipeline installed after July 31, 1971 that is exposed to the atmosphere will be cleaned and either coated or jacketed with a material suitable for the prevention of atmospheric corrosion." The conditional statement , "installed after July 31, 1971" should be removed or otherwise revised to clarify that this regulation applies to each pipeline or portion of pipeline that is exposed to the atmosphere, unless it falls under the exceptions listed in paragraph (c). In addition, the procedures do not give personnel adequate guidance on how to evaluate the condition of no coating or inadequate coating at air-soil interface locations.

DEQP Response:
Standard Practice 7-00-01, "General Corrosion Control Procedures" Revision 02B, Section 18 has been modified in Revision 02C as shown in Figure 1 below. A copy of Revision 02C has been included with this transmittal; please see SP 7-00-01 P 02C.pdf:

18. Atmospheric Corrosion Control: General

§192.479

18.1. Each pipeline or portion of pipeline that is exposed to the atmosphere must be cleaned and coated, except pipelines under Section 18.3 below.

18.2. Coating material must be suitable for the prevention of atmospheric corrosion. See Standard Practice 9-03-01, "Protective Coatings" for Company-approved coatings for above ground piping.

18.3. Except portions of pipelines at soil-to-air interfaces, the pipeline need not be protected from atmospheric corrosion if demonstrated by test, investigation, or experience appropriate to the environment of the pipeline that corrosion will:

18.3.1. Only be a light surface oxide; or

18.3.2. Not affect the safe operation of the pipeline before the next scheduled inspection.

18.4. See Standard Practice 7-35-01, "Inspecting Aboveground and Exposed Portions of Steel Pipelines and Facilities for Corrosion."

Figure 1: Standard Practice 7-00-01, Revision 02C

Procedures for evaluating condition of no coating and inadequate coating at air-soil interface locations have been added to Standard Practice 7-35-01, "Inspecting Aboveground and Exposed Portions of Steel Pipelines and Facilities for Corrosion," Revision 02D, Section 7.3. Figure 2 shows the changes included in Revision 02D. Additionally, definitions for Fair and Poor Coating conditions are shown in Figure 3. A copy of Standard Practice 7-35-01, Revision 02D is included with this transmittal; please see SP 7-35-01 P 02D.pdf.

7.3. Attention should be given to pipe at locations such as soil-to-air interfaces, under thermal insulation, under disbonded Coatings, clamps, pipe supports and in spans over water. Where there is an indication of corrosion at clamps or pipe supports, loosen clamps and/or lift the pipe if necessary to visually check the pipe surface (only when it is safe to do so). It

is typically not safe to lift pipe containing pressure without advanced planning and special precautions as discussed in 6.1 through 6.4 above.

7.3.1. Soil-to-air interfaces are susceptible to corrosion and 49 CFR 192.479 requires soil-to-air interfaces be protected from atmospheric corrosion. Ensure each soil-to-air interface is inspected for satisfactory coating condition. If any unsatisfactory condition is found, notify your supervisor as soon as possible and make any repairs necessary to restore the coating condition. See Standard Practices 7-00-01, "General Corrosion Control Procedures," 2-13-10, "Coating Buried Pipe" and 9-03-01, "Protective Coatings" for acceptable coating systems and application procedures when making coating repairs.

a. If coating repairs cannot be completed upon discovery, contact Pipeline Compliance to generate a tracking item in the DOT System. Remedial measures shall be tracked per Standard Practice 5-90-00, "Remedial Action Process and Procedures."

I. Fair coating condition: A Preventative Maintenance action in the DOT System will be assigned to Area Supervision to track the coating repair.

II. Poor coating condition: A Remedial Action in the DOT System will be assigned to Area Supervision to track coating repairs.

III. Consider increasing the inspection frequency from 36 months, not-to-exceed 39 months to a more frequent interval to ensure coating/corrosion conditions do not deteriorate while planning/executing repairs.

Figure 2: Standard Practice 7-35-01, Revision 02D

3. **Definitions**

3.1. Carrier Pipe: Pipe for transporting gas.

3.2. Coating: Paint, tape or other external material applied to pipe as a protective covering.

3.3. Coating Condition:

3.3.1. Good (No/Minor Damage): Pipeline coating has no visible defects or is slightly peeling or may have a few small bubbles between the pipe and coating.

3.3.2. Fair (Medium Damage): Pipeline coating is peeling and/or has bubbles between the pipe and the coating.

3.3.3. Poor (Heavy Damage): Pipeline coating is peeling and entirely missing in some areas.

Figure 3: Standard Practice 7-35-01, Revision 02D – Coating Conditions

3. *§192.605 Procedural manual for operations, maintenance, and emergencies.*
   (a) ...
   (c)Abnormal operation. For transmission lines, the manual required by paragraph (a) of this section must include procedures for the following to provide safety when operating design limits have been exceeded:
   (4) Periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found.

DEQP's O&M did not have adequate procedures for abnormal operations with regard to periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operations and taking corrective action where deficiencies are found. Although DEQP has procedures for abnormal operations, Section 7.1.5 of its procedures states DEQP "shall review" abnormal event procedures, but does not specify when or how long they have to accomplish review of abnormal event procedures. Since the regulation requires periodic review, DEQP's written procedures must specify how often these reviews must take place.

DEQP Response:
Standard Practice 4-00-01, "MAOP Operating Limits and Abnormal Conditions," Revision 03B, Section 7.1.5 was modified to define the frequency in which review occurs (see Figure 4 below), which is once each calendar year. A copy of the revised standard is included with this transmittal; please see SP 4-00-01 P 03B.pdf.

7.1.5. Operations and Gas Control Supervision shall review the response of Operations and Gas Control personnel to determine the effectiveness of the procedures used for responding to the Abnormal Operations periodically, at least once each calendar year. Contact the appropriate supervision to ensure there is necessary follow-up on any deficiencies/corrective action.

a. Supervisor of Pipeline Compliance will schedule an annual meeting (each calendar year) and prepare an agenda to review Abnormal Operations occurring prior to the meeting.

b. Meeting agenda will include a review of any required corrective actions and a discussion on any procedural improvements that may be beneficial in preventing future occurrences.

Rev. 03B 9/18/2018

Figure 4: Standard Practice 4-00-01, Revision 03B

4. *§192.605 Procedural manual for operations, maintenance, and emergencies.*
   (a) ...
   (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.
   (8) Periodically reviewing the work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operation and maintenance and modifying the procedures when deficiencies are found.

DEQP's O&M did not have adequate procedures for periodically reviewing the work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operation and maintenance and modifying the procedures when deficiencies are found. Although DEQP has procedures for periodic review of operation and maintenance procedures in SP 3-90-01, Annual Review of Procedures Manual and Periodic Review of Work Done by Company

Personnel: Section 7, Periodic Review of Work Done by Company Personnel, it does not specify when or how long they have to accomplish review of their maintenance and normal operating procedures to determine adequacy and effectiveness. Although DEQP informed PHMSA that periodic means 3 years, not-to-exceed 39 months, during the inspection, their procedures do not reflect this. Since the regulation requires periodic review, DEQP's written procedures must specify how often these reviews must take place.

DEQP Response:
Standard Practice 3-90-01, "Annual Review of Procedures Manual and Periodic Review of Work Done by Company Personnel," Revision 01E, Section 7.1, published 12/20/2017, defines Periodic Review of work done by Company personnel as shown below in Figure 5 (once each three calendar years). A copy of Revision 01E is included with this transmittal; please see SP 3-90-01 P 01E.pdf:

7. Periodic Review of Work Done by Company Personnel

NOTE: *Employees responsible for the Periodic Review of work done by Company personnel shall be designated in the Central DOT Records System.*

7.1. Periodic Review of work done by Company personnel shall be performed at least once each three calendar years.

Figure 5: Standard Practice 3-90-01, Revision 01E

5. §192.614 Damage prevention program.
   (a) ...
   (c) The damage prevention program required by paragraph (a) of this section must, at a minimum:
   (1) Include the identity, on a current basis, of persons who normally engage in excavation activities in the area which the pipeline is located.

DEQP's written program to prevent damage to its pipeline from excavation activities is deficient because it fails to sufficiently identify the persons normally engaged in excavation activities in the area in which the pipeline is located. Although DEQP has procedures for identifying persons who normally engage in excavation activities in Standard Practice 5-00-07, Sect 7., it does not currently have a procedure (or ability) to identify excavators from one-call not included on their excavator/contractors list. And the procedure did not specify how reports of Third Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications with excavators along the system.

DEQP Response:
Standard Practice 5-00-07, "Underground Facilities Damage Prevention Program," Revision 01A, Section 6 has been modified to include Sections 6.2 and 6.3 in Revision 01B. The revisions describe the process by which Third Party Activity and names of associated contractors or excavators will be incorporated into Public Awareness mailing and communication stakeholder lists. Figure 6 shows the changes below and a copy of Revision 01B has been included in this transmittal; please see SP 5-00-07 P 01B.pdf:

6. Identification and Notification of Stakeholder Audiences

6.1. See Company's Public Awareness Program for a description of the stakeholder audiences. This program also defines the baseline messages and the frequency of delivery, and the method for delivering these messages.

6.2. Pipeline Compliance will provide a report of individuals and companies generating Location Requests to Corporate Communication to include in stakeholder audience identification of excavators for Public Awareness Program baseline messaging. This report will be provided each calendar year, typically in January, prior to the current year's baseline messaging, typically occurring in April.

Rev 01B 9/18/2018

Standard Practice 5-00-07 Page 3 of 18

6.3. Reports of individuals and companies generating Location Requests can be accessed from the 811 One-Call System centers or directly from a ticket management application or software.

Figure 6: Standard Practice 5-00-07, Revision 01B

PHMSA Recommendation:

In addition to the alleged inadequacies cited above, PHMSA would also like to recommend that DEQP define the terms "management" and " for cause" in its procedures for anomalies discovered in non-HCA areas. Specifically, Standard Practices (SP) 5-01-00, Section 6, the procedure for Anomaly Response

Scheduling for Non-covered Segments, indicates that "[i]f the anomaly is in a Class 1 Location, non-HCA, and outside any Consequence Areas, the response time requirement may be lengthened with management approval (for cause)." This is not an alleged violation.

DEQP Response:
Standard Practice 5-01-00, "Anomaly Response and Reassessment Schedules for Non-covered Segments," Revision 00B, Section 6.3.3.b was modified to read as shown in Revision 00C (see Figure 7). A copy of Revision 00C has been included with this transmittal; please see SP 5-01-00 P 00C.pdf:

> b. If the Anomaly is in a Class 1 Location, non-HCA, and outside any Consequence Areas, the response time requirement may be lengthened with approval from the Manager of Integrity Management, if access or excavation safety is a concern due to difficult terrain, bad weather conditions, land owner/agency constraints etc.

Figure 7: Standard Practice 5-01-00, Revision 00C

Costs associated with this fulfilling this Notice of Amendment (preparation/revision of plans, procedures):

Line Item	Description	Time (hours)	Estimated Rate/hour	Line Item Total
1	Preparation of Response Letter	5	$100.00	$500.00
2	Review of Response Letter	15	$150.00	$2,250.00
3	Staff Labor to complete revisions	20	$75.00	$1,500.00
4	Procedures Committee Labor to review and approve revisions	27	$125.00	$3,375.00
5	Management Labor to review and approve revisions	6	$175.00	$1,050.00
6	Staff Labor to archive revision history and publish revisions	6	$75.00	$450.00
			Total	$9,125.00
A. Estimate rates assume overheads and benefits, not just hourly salaries.				

If you have any questions or requests pertaining to this matter, please don't hesitate to contact me. DEQP appreciates the opportunity to work with PHMSA to improve Company procedures and pipeline safety processes.

Regards,

Ron Jorgensen
Vice President, Western Pipeline Operations
Dominion Energy Questar Pipeline Services