

## NOTICE OF AMENDMENT

### VIA E-MAIL TO MR. DANIEL BRITTON

July 18, 2022

Mr. Daniel Britton  
IGU General Manager  
Interior Gas Utility  
2525 Phillips Field Road  
Fairbanks, AK 99709

**CPF 5-2022-010-NOA**

Dear Mr. Britton:

On January 12, 2021, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected Interior Gas Utility's (IGU) procedures for Welding & Cooldown/Start-up in North Pole, Alaska.

As a result of the inspection, it appears that IGU's written procedures are inadequate to assure safe operation of the pipeline as follows:

**1. § 193.2301 Scope.**

**Each LNG facility constructed after March 31, 2000 must comply with requirements of this part and of NFPA-59A-2001 (incorporated by reference *see* §193.2013). In the event of a conflict between this part and NFPA 59A, this part prevails.**

**NFPA 59A 6.3.4 Welding**

**6.3.4.1 Qualification and performance of welders shall be in accordance with Section 328.2 of ASME B 31.3, *Process Piping*, and 6.3.4.2 of this standard.**

## **ASME B 31.1, paragraph 328.1**

**Welding and Brazing Qualification. Welding and brazing procedure specifications (WPSs and BPSs) to be followed in production welding shall be prepared and qualified...**

IGU's procedures were inadequate to assure safe operation of a pipeline facility. Specifically, IGU's written procedures failed to implement the requirements of NFPA 59A 6.3.4.1, which states that "[q]ualification and performance of welders shall be in accordance with Section 328.2 of ASME B 31.3, *Process Piping*, and 6.3.4.2 of this standard." Paragraph 328.1 of ASME B 31.3 requires that, "[w]elding and brazing procedure specifications (WPSs and BPSs) to be followed in production welding shall be prepared and qualified ..."

IGU did not prepare welding procedure specifications to be followed in production welding. IGU's drawings & welding procedures did not reference which welding specifications were utilized. As a result, it was impossible to determine whether correct welding specification processes were followed to complete construction welds. IGU must revise its procedures to clearly state which welding specifications must be utilized to complete construction welds.

## **2. § 193.2503 Operating procedures.**

**Each operator shall follow one or more manuals of written procedures to provide safety in normal operation and in responding to an abnormal operation that would affect safety. The procedures must include provisions for:**

**(a) . . . .**

**(b) Startup and shutdown, including for initial startup, performance testing to demonstrate that components will operate satisfactory in service.**

IGU's procedures were inadequate to assure safe operation of a pipeline facility. Specifically, IGU's written procedures failed to implement the requirements of § 193.2503 (b), which states that procedures must include provisions for startup, including for initial startup and performance testing to demonstrate that components will operate satisfactory in service.

IGU's Cooldown & Start-up Procedure allowed for natural gas to be introduced into the distribution system to customers at unsafe concentrations for transportation/usage. Moreover, the procedure document had illegible sections with missing verbiage and data. IGU must revise its procedures to require that gas be introduced into the distribution system to customers at concentrations that are safe for transportation/usage and prevent the formation of a hazardous mixture of gas and air in accordance with § 192.629(a).

## Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. 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).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. 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 an Order Directing Amendment. If 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. § 190.206). 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 Interior Gas Utility maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Dustin Hubbard, Director, Western Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 5-2022-010-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Dustin Hubbard  
Director, Western Region  
Pipeline and Hazardous Materials Safety Administration

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

cc: PHP-60 Compliance Registry  
PHP-500 M. Yeager (#20-191036)  
Mark Rockwell, Interior Gas Utility (via email)  
Brendan Kern, Engineer, Interior Gas Utility (via email)