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CERTIFIED MAIL

May 1, 2012

Mr. Byron Coy, Jr.
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
Mountain View Office Park
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

RE: CPF 1-2012-5007M

Dear Mr. Coy,

This letter is the formal response by Dominion Transmission, Inc. (DTI) to the Notice of Amendment dated April 2, 2012. The Notice identified four (4) separate inadequacies in regard to DTI's operating and maintenance procedures. The response to each is noted below.

"1. §195.402 Procedural manual for operations, maintenance, and emergencies.

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(2) Gathering of data needed for reporting accidents under Subpart B of this part in a timely and effective manner.

DTI's procedures, Standard Operating Procedure (SOP) 185/46 – General, were inadequate in that they failed to include guidance for gathering of data needed for reporting accidents under Subpart B of this part in a timely and effective manner. The procedures did not include guidance for "§195.49 Annual Report", which addresses annually completing and submitting DOT Form PHMSA F 7000-1.1 for each type of hazardous liquid pipeline facility operated at the end of the previous year."

DTI Response:

Item #1 involves two separate issues; procedural guidance for both Accident and Annual Reporting.

Accident Reporting

Accident Reporting is not covered under DTI procedure *SOP 185/46 – General*. Rather, this topic is addressed separately in *SOP 185/03 – Accident Reports*. For your reference, a copy of this procedure is included with this response in Appendix A.

Annual Reports

Investigation of this issue revealed that the procedure in question had been truncated during the implementation of DTI's new document management system (Documentum). DTI addressed the deficiency by revising its *SOP 185/46 – General* to include guidance for the submittal of Annual Reports as required by §195.49. A copy of the revised procedure was provided to Mr. Robert Burrough (Inspector) via email on November 17, 2011. For your reference, a copy of the most recently revised procedure is included with this response in Appendix B.

“2. §195.402 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

DTI's procedures, SOP 185/34 - Pressure Testing, were inadequate in that they failed to require that records be kept of the temperature of the test medium or pipe during the pressure test period as per §195.310(b)(10) - The record required by paragraph (a) of this section must include: Temperature of the test medium or pipe during the test period.”

DTI Response:

Investigation of this issue revealed that the procedure in question had been truncated during the implementation of DTI's new document management system (Documentum). DTI addressed the deficiency by revising its *SOP 185/34 – Pressure Testing* to include the proper record-keeping requirements as noted in §195.310. For your reference, a copy of this revised procedure is included with this response in Appendix C.

“3. §195.402 Procedural manual for operations, maintenance, and emergencies.

(e) Emergencies. The manual required by paragraph (a) of this section must include procedures for the following to provide safety when an emergency condition occurs;

DTI’s emergency response training procedures, which includes SOP 185/42 – Training, SOP 185/24 – Emergency Plans and the DTI Emergency Plan, were inadequate in that they failed to require and verify that its supervisors maintain a thorough knowledge of that portion of the emergency response procedures established under §195.402 for which they are responsible to ensure compliance as per §195.403(c).”

DTI Response:

In regard to Item #3, DTI would like to point out that its procedures do require that the knowledge of its supervisory personnel is verified in regard to its emergency procedures. Specifically, DTI *SOP 185/42 – Training* Section II(C) states:

- C. To ensure compliance, DTI shall require and verify that its supervisors maintain a thorough knowledge of those procedures for which they are responsible.

Annually, at intervals not exceeding 15 months, each employee (including supervisory personnel) is trained on the requirements of DTI’s Emergency Plan. That training includes a graded exam that serves as verification that each employee understands his or her responsibilities during an emergency situation. The training addresses specific scenarios in regard to hazardous liquid emergency response, as well as the roles and responsibilities of each employee.

“4. §195.402 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

DTI’s mainline valve inspection procedures, which includes OQ-071-GL and the on-line

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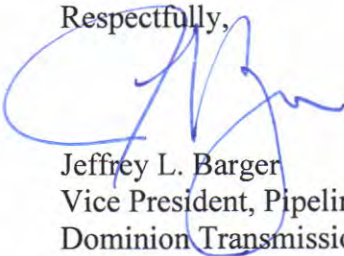
Inspection History Detail Listing for Valve Inspection, were inadequate in that they failed to provide a process to document that the mainline valves were functioning properly as per §195.420(b). The Inspection History Detail Listing for Valve Inspection form's field entitled "Power Operator" was creating confusion among company personnel as to whether the valve was functioning properly."

DTI Response:

The review of inspection records for valve maintenance revealed an inconsistency among operating personnel when completing the "Power Operator" field on DTI's valve inspection form. The field is meant to serve as an indication as to the whether the valve is *equipped* with a power operator. Rather, the question was at times misinterpreted to mean that the inspection was actually conducted through the *use* of the power operator. Though this question was not answered consistently, the forms do indeed indicate that the valves were checked for operability as required by §194.420(b). To eliminate confusion, DTI is revising its inspection form to remove the "Power Operator" question.

If you have any questions, or should require additional information, please do not hesitate to contact Shawn Miller at (304) 627-3404.

Respectfully,



Jeffrey L. Barger
Vice President, Pipeline Operations
Dominion Transmission, Inc.