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Brian C. Sheppard
Vice President – Eastern Pipeline Operations
Gas Infrastructure Group

925 White Oaks Boulevard, Bridgeport, WV 26330
DominionEnergy.com



CERTIFIED MAIL

August 16, 2019

Mr. Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

RE: CPF 1-2019-1010M

Dear Mr. Burrough,

This letter is the formal response by Dominion Energy Transmission, Inc. (DETI) to Notice of Amendment (NOA) CPF 1-2019-1010M dated July 22, 2019, which identified one (1) concern in DETI's Welding Procedures that requires clarification or further explanation.

More specifically, PHMSA noted the following:

"1. § 192.225 Welding procedures.

- (a) Welding must be performed by a qualified welder or welding operator in accordance with welding procedures qualified under section 5, section 12, Appendix A or Appendix B of API Std 1104 (incorporated by reference, see § 192.7) or section IX of the ASME Boiler and Pressure Vessel Code (ASME BPVC) (incorporated by reference, see § 192.7) to produce welds meeting the requirements of this subpart. The quality of the test welds used to qualify welding procedures must be determined by destructive testing in accordance with the applicable welding standard(s).***

Dominion's welding procedures qualified under section 5 of API Std 1104 were inadequate. Specifically, Dominion's Weld Procedure DT-312SC-WOL 04/01/07 Rev.: 0 and DT-322SC-WOL 04/01/07 Rev.: 0 (Procedures) did not designate the maximum time between the completion of the root pass and hot pass, and the hot pass and 3rd pass, as required by section 5 of API Standard 1104 - Welding of Pipelines and Related Facilities, 20th Edition (API 1104).

API 1104, Section 5.3.2.10 states:

"The maximum time between the completion of the root bead and the start of the second bead, as well as the maximum time between the completion of the second bead and the start of other beads, shall be designated."

On January 15, 2016, API issued a technical interpretation clarifying the intent of Section 5.3.2.10 of API 1104 20th Edition, which stated "Yes, the intent of API 1104, Section 5.3.2.10 is to identify the maximum time between the 1st pass and 2nd pass and the maximum time between the 2nd pass and 3rd pass."

During the inspection, the Procedures were reviewed. The Procedures stated under Time Between Passes, "All passes for Fittings shall be completed without delay." Therefore, DETI's Procedures failed to designate the time between weld passes as required by section 5 of API 1104, referenced in § 192.225(a).

DETI Response:

DETI is proposing to retire welding procedures DT-312Sc-WOL and DT-322Sc-WOL and implement new welding procedures DET 312Sc-WOL and DET 322Sc-WOL. The below excerpt displays the new requirements for Time Between Passes for welding procedure DET 312Sc-WOL. A copy of the document is provided in Appendix A of this response.

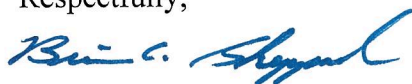
TIME BETWEEN PASSES:	<i>Maximum time between completion of first pass and start of the second pass shall be 5 minutes. Time between the completion of the second pass and the start of the other passes should be 5 minutes.</i>
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The below excerpt displays the new requirements for Time Between Passes for welding procedure DET 322Sc-WOL. A copy of the document is provided in Appendix B of this response.

TIME BETWEEN PASSES:	<i>Maximum time between completion of first pass and start of the second pass shall be 5 minutes. Time between the completion of the second pass and the start of the other passes should be 5 minutes.</i>
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The proposed new welding procedures have been published, will be documented on future welding procedure specification (WPS) pipe tables and reviewed with personnel on future applicable tasks. If you have any questions, or should require additional information, please do not hesitate to contact Jeremy Ross at (681) 842-3586.

Respectfully,



Brian C. Sheppard
Vice President, Eastern Pipeline Operations
Dominion Energy Transmission, Inc.