

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

November 17, 2022

Mr. Thomas Meissner
President and Chief Executive Officer
Granite State Gas Transmission Inc.
6 Liberty Lane W
Hampton, New Hampshire 03842

CPF 1-2022-074-NOA

Dear Mr. Meissner:

From July 11, 2022, through July 15, 2022, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code virtually inspected Granite State Gas Transmission Inc.'s (Granite) procedures for operations and maintenance.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within Granite's plans or procedures, as described below:

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 the following, if applicable, to provide safety during maintenance and operations.**
 - (1) ...
 - (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.**

Granite's manual of written procedures was inadequate to ensure safe operation of a pipeline facility. Specifically, Granite failed to include procedures for periodically reviewing the work

done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operation and taking corrective action where deficiencies are found.

During the inspection, PHMSA reviewed Granite's *Operations and Maintenance Manual Selected Topics Version 14.0, dated 06/17/2022* (O&M Manual). Granite's O&M Manual, Section 10.01.03 O&M - Plan Administration, subsection 3.1 – Plans: General, stated that observation of personnel performing work defined in the O&M Manual will be performed, and this QA/QC will be performed periodically. However, the O&M Manual failed to provide sufficient detail regarding who performs the review, how often the review is done, and how the review will be documented.

Therefore, Granite's written procedures were inadequate. Granite must revise its procedures to provide sufficient detail regarding § 192.605(b)(8).

2. § 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:

(1) ...

(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.

Granite's manual of written procedures was inadequate to ensure safe operation of a pipeline facility. Specifically, Granite failed to include procedures for periodically reviewing work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in abnormal operation and taking corrective action where deficiencies are found.

During the inspection, PHMSA reviewed Granite's O&M Manual, Section 220.05.03 - Abnormal Operations, subsection 3.1.4 - Reviewing Responses to an Abnormal Operation. The O&M Manual failed to provide sufficient detail regarding who performs the review, how often the review is done, and how the review will be documented.

Therefore, Granite's written procedures were inadequate. Granite must revise its procedures to provide sufficient detail regarding § 192.605(c)(4).

3. § 192.605 Procedural manual for operations, maintenance, and emergencies

(a) ...

(d) Safety-related condition reports. The manual required by paragraph (a) of this section must include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions that are subject to the reporting requirements of § 191.23 of this subchapter.

Granite's manual of written procedures was inadequate to ensure safe operation of a pipeline facility. Specifically, Granite's O&M Manual did not provide any instructions enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions (SRCs) pursuant to § 192.605(d).

During the inspection, PHMSA requested Granite's procedure(s) regarding recognizing SRCs. Granite provided its O&M Manual and referenced Section 220.005.002 - Safety Related Condition Identification. This procedure identified a list of potential SRCs as defined in § 191.23. However, this procedure failed to reference, provide any specific guidance, or instruct operations and maintenance personnel on how to recognize potential SRCs.

Therefore, Granite's written procedures were inadequate. Granite must revise its procedures to enable personnel to recognize conditions that may be SRCs in accordance with § 192.605(d).

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 Enforcement 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 Granite State Gas Transmission Inc. maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Robert Burrough, Director, Eastern Region, Pipeline and Hazardous Materials Safety Administration, 840 Bear Tavern Road, Suite 300, West Trenton, NJ 08628. In correspondence concerning this matter, please refer to **CPF 1-2022-074-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible. Smaller files may be emailed to robert.burrough@dot.gov. Larger files should

be sent on USB flash drive accompanied by the original paper copy to the Eastern Region Office.

Sincerely,

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: Response Options for Pipeline Operators in Enforcement Proceedings