



July 12, 2024

Mr. Matt Valerio
Sr. Engineer | Project Manager, PHP-100 – Eastern Region
US Department of Transportation -Pipeline and Hazardous Materials Safety Administration

Re: CPF 1-2024-025-NOA

Dear Mr. Valerio,

By this letter, Granite State Gas Transmission (the “Company” or “Granite State”) is providing a supplemental response to the Notice of Amendment (CPF 1-2024-025-NOA) response filed on July 8, 2024. This response is to PHMSA’s request on July 11, 2024 for references to the sections modified. Below provides a high level on the sections modified in the context of the finding and Attachment-CPF-1-2024-025-NOA-04 provides the audit trail redlines of all modifications.

Item 1

Granite State’s procedures failed to include a process related to cracks that survive pressure testing, in accordance with 192.712(d)(3).

Company Supplemental Response

Please see Attachment-CPF-1-2024-025-NOA-01 for the updated procedures IMP 3 and 220.02.12 along with the newly developed procedure 220.02.13¹ Crack Evaluation Plan. These procedures address analyzing potential cracks that could have survived pressure testing. Below provides a summary of the sections updated in IMP 3 and 220.02.12 that address items 1 through 4 of this response:

- IMP 3 – Section 3.2 Pipeline Threat Identification and Section 3.3 Pipeline Threats (subparts 3.3.2, 3.3.3, 3.3.6, and 3.3.12) were modified to enhance the language associated with corrosion threats.
- 220.02.12 – Section 1.0 Scope, Section 3.3 Crack and Crack-Like Defects and Section 6.1 Related Plan Documents were updated to reference the new procedure 220.02.13.

¹ Typo corrected from original response and correction carried throughout

Item 2

Granite State's procedures failed to include a process for evaluating crack like defects to ensure that a determination of the predicted failure pressure and the remaining life of the pipeline segment is established at the location of each anomaly or defect in accordance with 192.712(d)(1).

Company Response

Please see Attachment-CPF-1-2024-025-NOA-01 for the updated procedures IMP 3 and 220.02.12 along with the newly developed procedure 220.02.13 Crack Evaluation Plan. These procedures address the process for evaluating crack like defects to ensure that a determination of the predicted failure pressure and the remaining life of the pipeline segment is established at the location of each anomaly or defect.

Item 3

Granite State's procedures failed to include a process related to retaining records pursuant to 192.712(g) in accordance with 192.605(a).

Company Response

Please see Attachment-CPF-1-2024-025-NOA-01 for the updated procedures IMP 3 and 220.02.12 along with the newly developed procedure 220.02.13 Crack Evaluation Plan. These procedures address the process for managing and retaining applicable documents and records generated during susceptibility study, analyses, or engineering assessment.

Item 3

Granite State's procedures failed to include a process related to retaining records pursuant to 192.712(g) in accordance with 192.605(a).

Company Response

Please see Attachment-CPF-1-2024-025-NOA-01 for the updated procedures IMP 3 and 220.02.12 along with the newly developed procedure 220.02.13 Crack Evaluation Plan. These procedures address the process for managing and retaining applicable documents and records generated during susceptibility study, analyses, or engineering assessment.

Item 4

Granite State's procedures failed to include a process related to the performance of fatigue analysis and remaining life calculations for pipeline segment susceptible to cyclic fatigue, or other loading conditions that could lead to fatigue crack growth in accordance with 192.712(d)(2).

Company Response

Please see Attachment-CPF-1-2024-025-NOA-01 for the updated procedures IMP 3 and 220.02.12 along with the newly developed procedure 220.02.13 Crack Evaluation Plan. These

procedures address the process related to the performance of fatigue analysis and remaining life calculations for pipeline segment susceptible to cyclic fatigue, or other loading conditions that could lead to fatigue crack growth.

Item 5

Granite State's integrity management procedures failed to include details on gathering and integrating existing data and information on its pipelines in accordance with 192.917(b).

Company Supplemental Response

Please see Attachment-CPF-1-2024-025-NOA-02 for the updated IMP 4 and IMP 4-2 ILI Procedures which includes details on gathering and integrating existing data and information on its pipeline. Below provides a summary of the sections updated in IMP 4 and IMP 4-2 ILI:

- IMP 4 -Section 4.1 Scope, Section 4.2 Evaluation, Section 4.3 Integrity Assessment Methods (subparts 4.3.1, 4.3.2, 4.3.4, 4.3.6), and Section 4.4 Assessment Intervals (subparts 4.4.1, 4.4.2) were updated.
- IMP 4-2 ILI Procedure – Section 8.4 Validation and Data Integration was updated to address data gathering and integration.

Item 6

Granite State's procedures failed to include a process to ensure the baseline assessment is being conducted in a manner that minimizes environmental and safety risks, in accordance with 192.919(e).

Company Supplemental Response

Please see Attachment-CPF-1-2024-025-NOA-03 for the updated IMP 15, Environmental Construction Standards (ECS), and OEP-129. Below provides a summary of the sections updated in IMP 15, ECS, and OEP-129:

- IMP 15 – Section 15.3 Environmental Impact was updated to reference engineering guidance documents (such as OEP 129).
- ECS - Section II Upland Construction Subpart C2. Brush, Subpart E Access Roads, and Subpart I3 Restoration had “should” updated to “will” were appropriate.
- OEP-129 – Section 2.0 Safety and Environmental and Section 4.0 Inspection of facilities were added to the procedure. In addition, Section 3.0 Planning for Inline Inspection Operations and Section 7.0 Inspection Tool Receiving were modified to reference safety measures associated with pressure alert valves and transitioned “should” to “shall” were appropriate.

Sincerely,

A handwritten signature in black ink, appearing to read "Meggan Pena". The signature is fluid and cursive, with the first name "Meggan" written in a larger, more prominent script than the last name "Pena".

Meggan Pena

Director Pipeline Safety & Compliance