



July 8, 2024

Mr. Robert Burrough
Director, Eastern Region, Office of Pipeline Safety
US Department of Transportation -Pipeline and Hazardous Materials Safety Administration

Re: CPF 1-2024-025-NOA

Dear Mr. Burrough,

By this letter, Granite State Gas Transmission (the “Company” or “Granite State”) is providing a response to the Notice of Amendment (CPF 1-2024-025-NOA) provided on June 11, 2024. The Company appreciates the opportunity to provide responses to the items identified in the NOA.

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 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 analyzing potential cracks that could have survived pressure testing.

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 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.

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 Response

Please see Attachment-CPF-1-2024-025-NOA-03 for the updated IMP 15, Environmental Construction Standards (ECS), and OEP-129.

Sincerely,

A handwritten signature in black ink, appearing to read "Meggan Pena", with a stylized, cursive script.

Meggan Pena

Director Pipeline Safety & Compliance