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Mr. David Barrett
Director, Central Region
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Room 462
Kansas City, MO 64106-2641

RE: CPF 3-2012-1002M

Dear Mr. Barrett:

This letter is in response to PHMSA's Notice of Amendment dated March 21, 2012 sent to Vector Pipeline L.P. Enbridge (U.S.), Inc., as the operator of the Vector system, is responding on behalf of Vector Pipeline L.P. This letter addresses each of the 30 items identified by PHMSA.

Enbridge is not contesting the Notice of Amendment and will submit the actual amendments to PHMSA electronically within the required 90 days.

PHMSA Finding

1. §192.13 What general requirements apply to pipelines regulated under this part?

(c) Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.

§ 192.235 Preparation for welding.

Before beginning any welding, the welding surfaces must be clean and free of any material that may be detrimental to the weld, and the pipe or component must be aligned to provide the most favorable condition for depositing the root bead. This alignment must be preserved while the root bead is being deposited.

Vector's procedures were inadequate because it did not address properly aligning the pipe within API 1104's specifications for "high-low" and API 5L's pipe end diameter out of roundness specifications. Please reference PHMSA Advisory Bulletin ADB-10-03, "Pipeline Safety: Girth Weld Quality Issues Due to Improper Transitioning, Misalignment, and Welding Practices of Large Diameter line Pipe".

Enbridge Response

Numerous, but not all Enbridge welding procedures include the root bead offset requirements. However, this inspection identified the need to include the root bead offset in all butt welding procedures. Enbridge will provide additional verbiage to the fit-up procedure where this issue would first be identified in addition to the butt weld procedures.

PHMSA Finding

2. §192.13(c) (See Item 1 above)

§192.505 Strength test requirements for steel pipeline to operate at a hoop stress of 30 percent or more of SMYS.

(a) Except for service lines, each segment of a steel pipeline that is to operate at a hoop stress of 30 percent or more of SMYS must be strength tested in accordance with this section to substantiate the proposed maximum allowable operating pressure. In addition, in a Class 1 or Class 2 location, if there is a building intended for human occupancy within 300 feet (91 meters) of a pipeline, a hydrostatic test must be conducted to a test pressure of at least 125 percent of maximum operating pressure on that segment of the pipeline within 300 feet (91 meters) of such a building, but in no event may the test section be less than 600 feet (183 meters) unless the length of the newly installed or relocated pipe is less than 600 feet (183 meters). However, if the buildings are evacuated while the hoop stress exceeds 50 percent of SMYS, air or inert gas may be used as the test medium.

Vector's procedures were inadequate because they did not require that pipelines which operate above a hoop stress of 30% SMYS must be strength tested. Vector's current procedure indicates that pressure testing requirements are for piping that has an MAOP of greater than 50% SMYS.

Enbridge Response

This finding has been corrected by including the 30% value in the procedure.

PHMSA Finding

3. §192.13(c) (See Item 1 above)

§192.517 Records.

(a) Each operator shall make, and retain for the useful life of the pipeline, a record of each test performed under §§ 192.505 and 192.507. The record must contain at least the following information:

(1) The operator's name, the name of the operator's employee responsible for making the test, and the name of any test company used.
(2) Test medium used.
(3) Test pressure.
(4) Test duration.
(5) Pressure recording charts, or other record of pressure readings.
(6) Elevation variations, whenever significant for the particular test.
(7) Leaks and failures noted and their disposition.

Vector's procedures were inadequate because it did not specify or cross-reference what records must be kept for pressure tests.

Enbridge Response

While the listed code requirement information is identified on the Enbridge Hydro-Test forms, the procedure did not include the complete list. Amendments to include all code required information have been made.

PHMSA Finding

4. §192.605 Procedural manual for operations, maintenance, and emergencies

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least one each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

Vector's O&M Manual was not adequate because it did not indicate that the O&M manual would be reviewed and updated once per year not to exceed 15 months. During the review, Vector personnel showed that in the QMS, it is required that the O&M Manual be reviewed and updated once per year, not to exceed 15 months. However, there was no reference to the QMS in the O&M Manual.

Enbridge Response

As noted, the annual review of O&MP documents has been performed; however the requirement to complete the review was not spelled out. Enbridge has made amendments to outline the annual review requirement in the Procedures manuals.

PHMSA Finding

5. §192.605(a) (See Item 4 above)

§192.605(b)(11) Procedural manual for operations, maintenance, and emergencies

(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.

(11) Responding promptly to a report of a gas odor inside or near a building, unless the operator's emergency procedures under §192.615(a)(3) specifically apply to these reports.

Vector's O&M Manual was not adequate because there were no appropriate standards and procedures for addressing prompt response to a report of gas odor or any other potential leak call inside or near a building. Additionally, the O&M manual should address the possibility of receiving calls from the public regarding the crude oil liquid lines that run parallel to Vector.

Enbridge Response

Enbridge is developing and amending existing procedures to address this issue.

PHMSA Finding

6. §192.605(a) (See Item 4 above)

§192.605(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:

(2) Checking variations from normal operation after abnormal operation has ended at sufficient critical locations in the system to determine continued integrity and safe operation.

Vector's O&M Manual was not adequate because it lacked the procedures to check for variations from normal operation after an abnormal operation has ended.

Enbridge Response

Enbridge is enhancing existing procedures to monitor conditions after correcting Abnormal Operating Conditions.

PHMSA Finding

7. §192.605(a) (See Item 4 above)

§192.605(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:

(3) Notifying responsible operator personnel when notice of an abnormal operation is received.

Vector's O&M was not adequate because there was no guidance on how operating personnel are notified for any abnormal operation.

Enbridge Response

Enbridge is enhancing existing procedures to address notification of Abnormal Operating Conditions.

PHMSA Finding

8. §192.605(a) (See Item 4 above)

§192.609 Change in class location: Required study.

Whenever an increase in population density indicates a change in class location for a segment of an existing steel pipeline operating at a hoop stress that is more than 40 percent of SMYS, or indicates that the hoop stress corresponding to the established maximum allowable operating pressure for a segment of existing pipeline is not commensurate with the present class location, the operator shall immediately make a study to determine;

(a) The present class location for the segment involved.

(b) The design, construction, and testing procedures followed in the original construction, and a comparison of these procedures with those required for the present class location by the applicable provisions of this part.
(c) The physical condition of the segment to the extent it can be ascertained from available records;
(d) The operating and maintenance history of the segment;
(e) The maximum actual operating pressure and the corresponding operating hoop stress, taking pressure gradient into account, for the segment of pipeline involved; and,
(f) The actual area affected by the population density increase, and physical barriers or other factors which may limit further expansion of the more densely populated area.

Vector's O&M Manual is not adequate because it does not reflect what Vector actually does in the field to meet this requirement. The procedures shown to the MI-PSC was Book 3, Standard 03-02-04, entitled "Class Location Surveys", and appeared to be specific to the liquid process even though it indicated natural gas. Additionally, Part 195 does not have class locations. The procedure must indicate how changes found in the field are conveyed to operations management, or personnel performing the study.

Enbridge Response

Enbridge contracts Class Location survey and analysis. The contract vendor supplies their process of data analysis to Enbridge annually. Enbridge will modify existing procedures to include this vendor conducted process.

PHMSA Finding

9. §195.605(a) (See Item 4 above)

§192.613 Continuing Surveillance.

(b) If a segment of pipeline is determined to be in unsatisfactory condition but no immediate hazard exists, the operator shall initiate a program to recondition or phase out the segment involved, or, if the segment cannot be reconditioned or phased out, reduce the maximum allowable operating pressure in accordance with §192.619 (a) and (b).

Vector's procedure for continuing surveillance was not adequate because the procedures did not provide guidance on how pipeline segments that are identified to be in unsatisfactory condition should be addressed.

Enbridge Response

Enbridge has an Integrity Management Plan which is separate from the O&MP Manuals. Enbridge will include language in the procedures manual stating the Integrity Management Plan houses the procedure for conducting continued surveillance.

PHMSA Finding

10. §195.605(a) (See Item 4 above)

§192.619 Maximum allowable operating pressure - Steel or plastic pipelines

(a) No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum allowable operating pressure determined under paragraph (c) or
(d) of this section, or the lowest of the following: etc ....
(b) No person may operate a segment to which paragraph (a)(4) of this section is applicable, unless overpressure protective devices are installed on the segment in a manner that will prevent the maximum allowable operating pressure from being exceeded, in accordance with §192.195.
(c) The requirements on pressure restrictions in this section do not apply in the following instance. An operator may operate a segment of pipeline found to be in satisfactory condition, considering its operating and maintenance history, at the highest actual operating pressure to which the segment was subjected during the 5 years preceding the applicable date in the second column of the table in paragraph (a)(3) of this section. An operator must still comply with §192.611.

Vector's O&M Manual was inadequate because it did not contain any guidance for MAOP establishment.

Enbridge Response

Historically, MAOP has been established by Enbridge representatives during project design and construction. Additions will be made to existing Enbridge procedures to outline how MAOP is established.

PHMSA Finding

11. §192.605(a) (See Item 4 above)

§ 192.629 Purging of pipelines.

(a) When a pipeline is being purged of air by use of gas, the gas must be released into one end of the line in a moderately rapid and continuous flow. If gas cannot be supplied in sufficient quantity to prevent the formation of a hazardous mixture of gas and air, a slug of inert gas must be released into the line before the gas.
(b) When a pipeline is being purged of gas by use of air, the air must be released into one end of the line in a moderately rapid and continuous flow. If air cannot be supplied in sufficient quantity to prevent the formation of a hazardous mixture of gas and air, a slug of inert gas must be released into the line before the air.

Vector's O&M was inadequate because it did not have language in the O&M Manual that specifically stated how to determine the gas and/or air quantity necessary to prevent the formation of a hazardous mixture.

Enbridge Response

Existing procedures addressing purging of facilities are being amended to address this finding. Process guidance will be included in the amendments to mitigate this issue.

PHMSA Finding

12. §192.605(b) Procedural manual for operations, maintenance and emergencies

(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) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and Subpart M of this part.

§192.707 Line markers for mains and transmission lines

(d) Marker warning. The following must be written legibly on a background of sharply contrasting color on each line marker:

(1) The word "Warning," "Caution," or "Danger" followed by the words "Gas (or name of gas transported) Pipeline" all of which, except for markers in heavily developed urban areas, must be in letters at least 1 inch (25 millimeters) high with ¼ inch (6.4 millimeters) stroke.

Vector's O&M manual was inadequate because there was no language in the O&M Manual that addressed all (letter height and/or stroke) of the pipeline marker design requirements.

Enbridge Response

Enbridge will include a statement incorporating the letter height and stroke requirements into the procedures manual.

PHMSA Finding

13. §192.605(b)(1) (See Item 12 above)

§192.463 External corrosion control: Cathodic protection.

(c) The amount of cathodic protection must be controlled so as to not damage the protective coating or the pipe.

Vector's procedures were inadequate because it did not specify the limits of voltage that may be applied to the pipe in order to prevent coating damage.

Enbridge Response

Multiple conditions affect cathodic protection limits. Enbridge will establish guidance on the range of applied cathodic protection levels within the procedures.

PHMSA Finding

14. §192.605(b)(1) (See Item 12 above)

§192.709 Transmission lines: Record keeping.

Each operator shall maintain the following records for transmission line for the periods specified:

(a) The date, location, and description of each repair made to pipe (including pipe to pipe connections) must be retained for as long as the pipe remains in service.
(b) The date, location, and description of each repair made to parts of the pipeline system other than pipe must be retained for at least 5 years. However, repairs generated by patrols, surveys, inspections, or tests required by subparts Subpart L and M of this part must be retained in accordance with paragraph (c) of this section.
(c) A record of each patrol, survey, inspection, and test required by subparts L and M of this part must be retained for' at least 5 years or until the next patrol, survey, inspection, or test is completed, whichever is longer.

Vector's O&M procedures were inadequate because the record keeping requirements were very vague and non comprehensive. The procedures must be more specific to provide guidance as to what is required (ie: what records are kept for leak surveys, MAOP establishment, etc.)

Enbridge Response

Enbridge recognizes providing clear direction to documentation requirements and is currently transitioning to an enhanced electronic maintenance and record management system. Procedures will be amended to reflect the record keeping requirements.

PHMSA Finding

15. §192.605(b)(1) (See Item 12 above)

§192.713 Transmission lines: Permanent field repair of imperfections and damages.

(a) Each imperfection or damage that impairs the serviceability of pipe in a steel transmission line operating at or above 40 percent of SMYS must be-

(1) Removed by cutting out and replacing a cylindrical piece of pipe; or
(2) Repaired by a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe.

Vector's O&M was inadequate because it did not have language in the O&M Manual that addressed the repair of imperfections or damages by cutting out a cylindrical piece of pipe and replacing it with pipe of greater than or equal design strength, or the use of a reliable engineering method. Vector's procedures also referenced temporary repairs, but did not provide any guidance as to what a temporary repair entails.

Enbridge Response

Language to address using a cylinder of pipe as a permanent repair will be included in the procedure manual.

PHMSA Finding

16. §192.605(b)(1) (See Item 12 Above)

§192.713 Transmission lines: Permanent field repair of imperfections and damages.

(b) Operating pressure must be at a safe level during repair operations.

Vector's O&M procedures were inadequate because there was no mention of how the "safe pressure" is calculated. Vector personnel indicated that they use the Rupture Pressure Ratio as derived from B31-G. This must be included in the Manual.

Enbridge Response

To clarify the safe operating requirements of affected pipeline segments, an amendment will be made to the procedures manual.

PHMSA Finding

17. §192.605(b)(1) (See Item 12 above)

§192. 717 Transmission lines: Permanent field repair of leaks.

Each permanent field repair of a leak on a transmission line must be made by·-
(a) Removing the leak by cutting out and replacing a cylindrical piece of pipe;

Vector's O&M Manual was inadequate because it did not have language in the O&M Manual that addressed the repair of a leak by cutting out a cylinder and replacing it with pipe of similar or greater design.

Enbridge Response

Language to address cutting out and replacing a cylinder of pipe as a permanent repair has been included in the procedures manual.

PHMSA Finding

18. §192.605(b)(1) (See Item 12 above)

§192.719 Transmission lines: Testing of repairs.

(a) Testing of replacement pipe. If a segment of transmission line is repaired by cutting out the damaged portion of the pipe as a cylinder, the replacement pipe must be tested to the pressure required for a new line installed in the same location. This test may be made on the pipe before it is installed.

Vector's current procedures, Book 3, Standard 07-02-03. "Test Pressure and Duration", was inadequate because it only addressed pressure testing requirements for short sections of piping that have an MAOP of greater than or equal to 50% of SMYS. There was no guidance for ensuring that replacement sections of pipe are tested to the pressure required for a new line in the same location.

Enbridge Response

Currently, pipeline maintenance staff does not conduct pressure tests of large fabrications or stock line pipe. Contract vendors, supplied with hydro testing requirements from Enbridge Engineering, have conducted testing for these items. However Enbridge will amend the procedure manuals to address this issue to eliminate any potential confusion.

PHMSA Finding

19. §195.605(b)(1) (See Item 12 above)

§192.731 Compressor stations: Inspection and testing of relief devices.

(c) Each remote control shutdown device must be inspected and tested at intervals not exceeding 15 months, but at least once each calendar year, to determine that it functions properly.

Vector's O&M procedures were inadequate because it did not address remote control shutdown device testing in the O&M Manual. Vector needs to add language that specifies the frequency of testing, what documentation is required as a result of the testing, and that prompt remedial repair or replacement is required for any deficiencies found. Additionally, language should also be added to the O&M Manual that states each station has its own specific testing procedure.

Enbridge Response

Enbridge routinely conducts testing of remote shutdowns as part of the annual ESD testing requirements. Enbridge also chooses different devices at random to initiate the ESD test. An amendment to existing procedures to capture the current practice will be incorporated in the O&M Manual.

PHMSA Finding

20. 195.605(b)(1) (See item 12 above)

§192.736 Compressor stations: Gas detection.

(c) Each gas detection and alarm system required by this section must be maintained to function properly. The maintenance must include performance tests.

Vector's O&M Manual was inadequate because the frequency of the testing was not specified in the manual. The Manual should also provide guidance on how to test the systems.

Enbridge Response

Enbridge currently uses a frequency of testing as recommended by the manufacturer of the instrument. The calibration test procedure will be amended to reflect the established practice to address the concerns noted.

PHMSA Finding

21. §192.605(b)(1) (See Item 12 above)

§192.743 Pressure limiting and regulating stations: Capacity of relief devices

(c) If a relief device is of insufficient capacity, a new or additional device must be installed to provide the capacity required by paragraph (a) of this section.

Vector's procedures were inadequate because they did not specify that capacities must be compared, and new or additional devices must be installed if the capacity is not sufficient for the relief.

Enbridge Response

Procedural requirements to verify capacity and install additional devices if necessary will be included in the procedures manual.

PHMSA Finding

22. §192.605(b)(1) (See Item 12 above)

§192.745 Valve maintenance: Transmission lines.

(a) Each transmission line valve that might be required during any emergency must be inspected and partially operated at intervals not exceeding 15 months, but at least once each calendar year.
(b) Each operator must take prompt remedial action to correct any valve found inoperable, unless the operator designates an alternative valve.

Vector's procedures were inadequate because they did not include any language that requires all emergency valves must be inspected once per calendar year, not to exceed 15 months, and prompt remedial action is required for any inoperable valve, or designate an alternative valve in its place.

Enbridge Response

Enbridge has always maintained valves to satisfy the code requirements which have been confirmed by previous Inspections. Enbridge has amended valve maintenance procedures to include the Emergency Valve designation along with the associated requirements to maintain an Emergency valve list.

PHMSA Finding

23. §192.605(b)(1) (See Item 12 above)

§192.751 Prevention of accidental ignition.

Each operator shall take steps to minimize the danger of accidental ignition of gas in any structure or area where the presence of gas constitutes a hazard of fire or explosion, including the following:

(a) When a hazardous amount of gas is being vented into open air, each potential source of ignition must be removed from the area and a fire extinguisher must be provided.

Vector's O&M Manual was inadequate because it did not have language that indicated where fire extinguishers shall be located, particularly if a hazardous amount of gas is being vented into the air.

Enbridge Response

Enbridge procedures currently address this requirement in Book 2; 14-02-04. Enbridge will submit this procedure with the amended ones.

PHMSA Finding

24. §192.605 Procedural manual for operations, maintenance, and emergencies

§192.605(b) - The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(4) Gathering of data needed for reporting incidents under Part 191 of this chapter in a timely and effective manner.

§191.7 Report submission requirements.

(a) General. Except as provided in paragraph (b) of this section, an operator must submit each report required by this part electronically to the Pipeline and Hazardous Materials Safety Administration at http://opsweb.phmsa.dot.gov unless an alternative reporting method is authorized in accordance with paragraph (d) of this section.

Vector's O&M Manual was not adequate because it did not specify that incident reports are to be filed electronically.

Enbridge Response

Historically, Enbridge has submitted required reporting electronically. A procedural amendment to reflect this process has been made.

PHMSA Finding

25. §192.605(b)(4) (See Item 24 above)

§191.15(c) Transmission systems, gathering systems, and liquefied natural gas facilities. Incident Report.

(c) Supplemental report. Where additional related information is obtained after a report is submitted under paragraph (a) or (b) of this section, the operator must make a supplemental report as soon as practicable with a clear reference by date to the original report.

Vector's O&M Manual was not adequate because there was no language that addresses the submission of a final report after the investigation of an incident has been completed. The requirement to submit the final report are in the directions for Form 7100.2 and should be noted within the O&M manual.

Enbridge Response

Historically, Enbridge has submitted the required final incident reports. A procedural amendment to reflect this process has been made.

PHMSA Finding

26. §192.605(b)(4) (See Item 24 above)

§191.17(a) Transmission systems, gathering systems, and liquefied natural gas facilities. Annual Report.

(a) Transmission or Gathering. Each operator of a transmission or a gathering pipeline system must submit an annual report for that system on DOT Form PHMSA 7100.2.1. This report must be submitted each year, not later than March 15, for the preceding calendar year, except that for the 2010 reporting year the report must be submitted by June 15, 2011.

Vector's O&M Manual was not adequate because it did not address when the annual reports are to be submitted and to whom.

Enbridge Response

Historically, Enbridge has submitted annual reports as required by regulation. A procedural amendment to reflect this process has been made.

PHMSA Finding

27. §192.615(a)(3)(i) Emergency plans.

(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:

(3) Prompt and effective response to a notice of each type of emergency, including the following:

(i) Gas detected inside or near a building.

Vector's O&M Manual was inadequate because it did not provide enough guidance on what to do if there were gas detected inside or near a building. For example, the procedure did not address how to determine and document the extent and concentration of gas below grade during a leak response. Vector provided the document Book 7, called "Emergency Response", which appeared to address the emergency response actions required for liquids operation. The section for the natural gas side was incomplete.

Enbridge Response

Enbridge is developing and amending existing procedures to address leaks below grade.

PHMSA Finding

28. §192.615(a)(4) Emergency Plans

(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:

(4) The availability of personnel, equipment, tools, and materials, as needed at the scene of an emergency.

Vector's O&M procedures were inadequate because they did not address this requirement. The list that Vector showed the MI-PSC staff was a list for equipment they would use for their liquid assets. The emergency equipment list for a natural gas emergency was not completed yet.

Enbridge Response

Emergency Response Equipment Trailers are positioned and supplied to respond to a multitude of situations. The inclusion of natural gas required equipment will be added to the supply list.

PHMSA Finding

29. §192.615(b)(1) Emergency plans.

(b) Each operator shall:

(1) Furnish its supervisors who are responsible for emergency action a copy of that portion of the latest edition of the emergency procedures established under paragraph (a) of this section as necessary for compliance with those procedures.

Vector's O&M procedures were inadequate because the procedures lacked the requirement that the emergency plan be furnished to supervisory personnel who are responsible for emergency action.

Enbridge Response

Enbridge maintains a manual suite available on-line and in hard copy format for field operations staff. Currently the guidance on who gets the O & MP Manuals which include the Emergency Response Manual is outlined in our O & MP Management System document along with a distribution list. A reference to this document will be made in the procedures.

PHMSA Finding

30. §192.617 Investigation of failures.

Each operator shall establish procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory

examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of a recurrence.

Vector's O&M manual was inadequate because it did not address a process for sample selection and preservation of failed equipment after an incident. Vector's procedures also lacked the process and the form to address the chain of custody for evidence gathered after an incident.

Enbridge Response

Existing Enbridge procedures outline how this process is completed for failed pipe. These procedures will be amended to include steps for equipment failure.

If you have any questions regarding Enbridge's response, please feel free to contact me directly at (715) 394-1512.

Respectfully,

Jay A. Johnson

cc: Mark Maki, Enbridge
John Gauderman, Enbridge
John Donaldson, Vector Pipeline L.P
Belinda Friis, Vector Pipeline L.P.