



Northern Natural Gas Company
P.O. Box 3330
Omaha, NE 68103-0330
402 398-7200

March 30, 2021
Updated April 2, 2021

Gregory A. Ochs
Director, Central Region
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 480
Kansas City, MO 64106

Re: Response to CPF 3-2021-1002, Notice of Probable Violation

Dear Mr. Ochs:

In accordance with the Notice of Probable Violation, Proposed Civil Penalty and Proposed Compliance Order, dated March 2, 2021, in the above referenced case, this letter contains Northern Natural Gas' response to the items referenced.

1. § 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 once 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.**

Northern Natural failed to follow a written procedure for conducting operations and maintenance activities and for emergency response. Specifically, Northern Natural failed to follow its procedure, Engineering Standard 7570 "Joining of Pipe & Piping Components Other Than by Welding" (Revision 11 8/20/2019). Sections 5.6.1.1 and 5.6.1.2 of the procedure contains the requirements for bolt and nut engagement for various flange connections at the company's pipeline facilities.

Northern's Response: Northern has been replacing or readjusting flange bolts systemwide to meet its engineering standard referenced. Some flange bolts can be remediated while in-service while others must be removed from service or bypassed. Of those specific locations listed in the Notice of Probable Violation, all have been repaired.

A separate response on this issue will be submitted in response to the Compliance Order.

2. § 192.631 Control room management.

(a)

(c) Provide adequate information. Each operator must provide its controllers with the information, tools, processes, and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:

(3) Test and verify an internal communication plan to provide adequate means for manual operation of the pipeline safely, at least once each calendar year, but at intervals not to exceed 15 months;

Northern Natural failed to test and verify their internal communication plan to provide adequate means for manual operation of the pipeline safely, at least once each calendar year, but at intervals not to exceed 15 months, in 2017.

Northern's response: Northern revised its procedures in September 2019 and provided training to address this issue.

Operating procedure 50.204, Internal Communication Plan Testing for Manual Operation of Pipeline, has been amended with additional structure related to the annual testing requirements. The process previously was documented on a mock emergency template but moving forward an Internal Communication Plan template that will include a checklist for following incident response and internal communication processes will be used for this procedure. A copy is attached for your review.

3. § 192.631 Control room management.

(j) Compliance and deviations. An operator must maintain for review during inspection:

(1) Records that demonstrate compliance with the requirements of this section;

Northern Natural failed to have records that demonstrated compliance to monitor the content and volume of general activity being directed to and required of each controller at least once each calendar year, but at intervals not to exceed 15 months, that will assure controllers have sufficient time to analyze and react to incoming alarms for the years 2016 and 2018 as required by § 192.631(e)(5).

Northern's response: Northern revised its procedures in December 2019 and provided training to address this issue.

Operating procedure 50.400, Alarm Management, has been amended to detail the collection of data and to analyze and confirm the volume of activity processed by each controller is at a level that does not jeopardize the safe operation of Northern facilities. If the analysis reveals deficiencies, corrective actions will be taken to ensure controllers have sufficient time to analyze and react to incoming alarms. Data is collected and reviewed monthly to be included in an annual report. New reports related to volume of alarms, phone calls and actions taken by the gas controllers were developed to document compliance with the regulation. The revised procedure is attached. See section 5.5.

4. § 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—**
(2) Repaired by a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe.

Northern Natural failed to repair pipe anomalies by a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe for anomalies identified on the New Lisbon Branch Line WIB14601, specifically Dent 30.

Northern's response: Northern did return to the anomaly site known as Dent 30, removed the ClockSpring composite wrap, ground the gouge to a smooth contour, and installed a new ClockSpring.

Northern developed a new operating procedure form to better document repairs, ensure proper repairs, and maintain adequate records. A copy is attached for your review.

As discussed in several telephone conversations since receipt of the Notice of Probable Violation, Items 2 and 3 above were previously addressed in a Warning Letter (CPF 3-2021-1001W) dated February 11, 2021. Since these items were already addressed in the Warning Letter, and the other items discussed above have been addressed, Northern respectfully requests that the Notice of Probable Violation be withdrawn, and the civil penalties be rescinded.

Should you have any further questions, please feel free to contact me directly at (402) 398-7715.

Sincerely,

Tom Correll

Tom Correll
Vice President, Pipeline Safety and Risk
Northern Natural Gas