



March 22, 2021

Mr. Gregory Ochs
PHMSA Pipeline Safety Central Region Office
901 Locust Street, Suite 462
Kansas City, MO 64106
816-329-3800
816-329-3831 (Fax)

Subject: Corrective Action Response to Notice of Amendment CPF 3-2022-048-NOA

Dear Mr. Ochs:

On December 6-10, 2021, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected KPC Pipeline, LLC's procedures in Wichita, Kansas. The procedures inspected were related to the natural gas integrity rule of 2019. KPC is submitting this letter to your office to update the Pipeline Safety Division on KPC's progress for resolution of the alleged violations from CPF No. 3-2022-048-NOA.

Alleged Violation 1

Description

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

KPC's procedures did not provide adequate guidance for determining traceable, verifiable, and complete (TVC) records as required by §192.607(c). KPC's procedures did not define what TVC records meant and did not provide any guidance on what records would be considered acceptable. For example, KPC utilizes secondary and tertiary documents to meet TVC requirements but was not mentioned anywhere within the procedure.

Additionally, KPC's procedures did not provide adequate guidance for defining opportunities to verify material properties when buried pipe is excavated ("opportunistic digs"). While KPC's procedures repeated the code requirements verbatim for examples of an opportunistic dig, the procedure did not identify any criteria that would render an exposure inappropriate for material verification, such as confined space concerns or unstable excavations. The Company must amend its written procedures to comply with the requirements of § 192.607(c).

KPC Response: KPC is in the process of enhancing its written procedures to comply with the requirements of § 192.607(c). A copy of the procedure will be provided to Mr. Gregory A. Ochs, Director, Central Region, Pipeline and Hazardous Materials Safety Administration by June 20, 2022.

19970 West 161st Street
Olathe, KS 66062
P – 913-764-6015 F – 913-764-6021



Alleged Violation 2

Description

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

KPC's procedures did not adequately provide guidance for verification of material properties and attributes using nondestructive methods as required by §192.607(d). KPC required the use of a third-party contractor for nondestructive methods of verification; however, KPC's procedures did not provide guidance for obtaining the contractor's procedures for KPC's review prior to the task being performed. The procedure also did not define or identify who is responsible for this process and what they must do to meet this requirement.

The Company must amend its written procedures to comply with the requirements of § 192.607(d).

KPC Response: KPC is current reviewing procedure language to amend its written procedures to comply with the requirements of § 192.607(d). A copy of the procedure will be provided to Mr. Gregory A. Ochs, Director, Central Region, Pipeline and Hazardous Materials Safety Administration by June 20, 2022.



Alleged Violation 3

Description

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

KPC's procedures did not adequately provide guidance for TVC records of components as required by §192.607(f). KPC's procedures did not address the company's determination on where the TVC records for components applied to above-ground facilities, nor did the procedures have any guidance on how to obtain TVC information for those components.

The Company must amend its written procedures to comply with the requirements of § 192.607(f).

KPC Response: KPC is in the process of amending its written procedures to comply with the requirements of § 192.607(f). A copy of the procedure will be provided to Mr. Gregory A. Ochs, Director, Central Region, Pipeline and Hazardous Materials Safety Administration by June 20, 2022.



Alleged Violation 4

Description

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

KPC's procedures did not provide adequate guidance for class location determination when a class change occurs on their pipeline as required by §192.611. The procedure did not identify who was responsible for monitoring and implementing the class change location procedure, their responsibilities (what they do), the processes they use to do the class location survey, how the data is gathered and updated, and who gets the information to process the change.

The Company must amend its written procedures to comply with the requirements of § 192.611.

KPC Response: KPC is in the process of amending its written procedures to comply with the requirements of § 192.611. A copy of the procedure will be provided to Mr. Gregory A. Ochs, Director, Central Region, Pipeline and Hazardous Materials Safety Administration by June 20, 2022.



Alleged Violation 5

Description

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

KPC's procedures did not provide adequate guidance for maximum allowable operating pressure (MAOP) reconfirmation as required by §192.624(a). KPC's procedures included a flow chart in Section 8 of the O&M manual that provided guidance to personnel to determine if their pipe is applicable to §192.624. However, the procedure (flow chart) did not go further to provide guidance on whether the applicable pipe falls under 192.624(a)(1) or 192.624(a)(2). Additionally, the procedure did not specify which reconfirmation method (if applicable) will be used, or that more detailed procedures would be developed prior to the use of that confirmation method.

KPC Response: KPC is actively collaborating with internal and third-party team members to support the procedure change (flow chart) that did not go further to provide guidance on whether the applicable pipe falls under 192.624(a)(1) or 192.624(a)(2). The procedure is also being modified to include language regarding which reconfirmation method (if applicable) will be used, or that more detailed procedures would be developed prior to the use of that confirmation method. KPC will provide a copy of the revised procedure to PHMSA once the update has been finalized and approved by KPC management, and prior to

KPC is committed to full compliance with the Commission's rules and appreciates your consideration in this matter.

Sincerely,

A handwritten signature in blue ink that reads "Adam Cowart".

Adam Cowart
Manager of EHS
KPC Pipeline, LLC