



Enbridge

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Houston, TX 77079

Via Electronic Mail

February 12, 2024

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

**RE: Texas Eastern Transmission, LP
Notice of Amendment
CPF 3-2023-029-NOA**

Dear Mr. Ochs,

From May 3 through May 5, 2022, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code, inspected Texas Eastern Transmission, LP's (TETLP) plan and procedures for gas transmission integrity management.

On December 11, 2023, PHMSA issued the above referenced Notice of Amendment (NOA) identifying five (5) apparent inadequacies found within TETLP's plans and procedures. The following is a brief summary of PHMSA's concerns and TETLP's response to those concerns.

PHMSA Finding

1. § 192.907 What must an operator do to implement this subpart?

The TETLP Integrity Management Plan was inadequate as it did not describe or define how "may", "should", and similar statements are implemented and followed within the Integrity Management Plan for documents incorporated by reference. TETLP's "P-IMP Appendix B" of the Integrity Management Plan did not describe implementation of "should" statements in materials incorporated by reference. As part of the integrity management (IM) program, referenced documents are included in decision-making, and a description of how decisions are made is required by § 192.907(a).

TETLP Response

TETLP is revising Section 10.1 of its Pipeline Integrity – Integrity Management Plan document to describe how “should” statements within B31.8S are implemented. A copy of the proposed changes is enclosed.

2. § 192.915 What knowledge and training must personnel have to carry out an integrity management program?

The TETLP Integrity Management Plan was inadequate as it did not provide the criteria for the qualification of persons, including supervisors, that review and evaluate the results of integrity assessments and evaluations for the following: external corrosion direct assessments (ECDA), internal corrosion direct assessments (ICDA), inline inspection, other technology, pressure testing and stress corrosion direct assessment (SCCDA). The IM plan must include specific criteria for each of the types of assessments and evaluations that are reviewed and analyzed within the integrity management program. § 192.907(a) requires the written IM plan describe how relevant decisions are made and by whom.

TETLP Response

TETLP developed Appendix B of procedure AI-05.002 “Integrity Management Competency and Training Guide” in August of 2023 to define the competency categories used in the qualification of persons, including supervisors, that review and evaluate the results of integrity assessments, including ECDA, ICDA, inline inspection, other technology, pressure testing, and SCCDA. Appendix C of procedure AI-07.002 “Asset Integrity Technical Capability Evaluation” was also revised to provide the minimum criteria for the qualification of persons that review and evaluate the results of integrity assessments. A copy of both Appendices is enclosed.

3. § 192.919 What must be in the baseline assessment plan?

The TETLP Integrity Management Program procedures were inadequate as they did not describe the information required to support the threat identification for the baseline assessment plan. The procedures did not describe how the baseline assessment plan is populated with all of the required information. The procedure needs to describe the records that are required for supporting the threat identification. A written baseline assessment plan is a required element of integrity management plans. See § 192.911(b).

TETLP Response

TETLP's procedure PI-04.102 "Threat Susceptibility Assessment Procedure" describes the information required to support threat identification. TETLP is revising Section 1 of procedure "PI-04.000 Integrity Plan Process" to include baseline assessment plan requirements which will identify new assets, newly identified HCAs/MCAs, and HCA/MCA expansions. A copy of the proposed changes is enclosed.

4. § 192.935 What additional preventive and mitigative measures must an operator take?

The TETLP procedure DP-50.300 was inadequate because it did not require investigation when TETLP finds physical evidence of excavations the operator did not monitor. The investigation must use above ground survey methods defined in NACE SP0502 with excavation and remediation of any indication of coating holidays or discontinuity warranting direct examination in accordance with ASME B31.8S and § 192.933. TETLP's procedure(s) must clearly indicate when and how excavations and/or above ground surveys will be used when physical evidence of an unmonitored third party excavation is discovered. Provisions for adding preventive and mitigative measures to protect high consequence areas is a required element of integrity management plans. See § 192.911(h).

TETLP Response

TETLP revised Section 11 of procedure DP-50.300 "Unauthorized Activity Reporting Procedure" in August of 2023 to provide guidance on how to proceed upon discovery of an unauthorized ground disturbance resulting in a potential line strike, including when and how excavations or above ground survey methods are to be conducted. A copy of the changes is enclosed.

5. § 192.939 What are the required reassessment intervals?

The TETLP Integrity Program procedures were inadequate as they did not specify how the determination of the reassessment interval was finalized and what records were to be maintained supporting the reassessment interval determination. A process of continual evaluation and assessment is a required element of integrity management plans. See § 192.911(f).

TETLP Response

TETLP added Section 6.6.5 of procedure PI-04.103 “Re-Assessment Interval Determination Procedure” to specify how the determination of the reassessment interval was finalized and what records were to be maintained supporting the interval determination. A copy of the changes is enclosed.

We trust that you will find the revisions to the stated procedures will address the issues noted in the NOA. Enbridge takes these issues very seriously and we are committed to addressing these issues in an expeditious manner. Please call me on (713) 627-6601 if you need additional information.

Sincerely,



Peter Seydewitz
Director, Operational Excellence
GTM Engineering & Asset Management

Attachments:

1. PI-IMP Section 10.1
2. AI-05.002 Integrity Management Competency and Training Guide Appendix B
3. AI-07.002 Asset Integrity Technical Capability Evaluation Appendix C
4. PI-04.000 Integrity Plan Process Section 1
5. DP-50.300 Unauthorized Activity Reporting Procedure Section 11
6. PI-04.103 Re-Assessment Interval Determination Procedure Section 6.6.5