



VIA ELECTRONIC MAIL TO: Gregory.Ochs@dot.gov, nkauj.her.ctr@dot.gov, ryan.mcclure@dot.gov, Mia.Petrucchi@dot.gov

May 17, 2024

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

CPF 3-2024-025-NOA

Dear Mr. Ochs:

In response to your notice issued March 15, 2023, DT Midstream has elected to provide the following response. This response includes no contest with four of the five allegations made in your notice. We are also providing proof that requested amendments were made. DT Midstream shall be contesting the fifth allegation made and are providing a written explanation and reasoning in support of our position.

Allegation #1: DT Midstream's Construction Specification MS-ENG-040, Section 17 – Pressure Testing requires modification to properly describe an acceptable number of tie-in welds.

No Contest

Explanation: DTM's specification "MS-ENG-040, Section 17- Pressure Testing" has been revised to the following:

- 17.5.7 Ensure piping assemblies will be tested in place (post construction) as much as practical as deemed by Company Engineering. Refer to paragraph 0 herein regarding allowable Tie-In welds.*
- *Multiple assemblies may be joined and tested as a single unit, utilizing flanged connections or other appropriate means for pressure testing.*
 - *If preferred, Contractor may request to test through pre-tested equipment and/or components. Contractor must follow Company Engineering direction and all manufacturers' recommendations if the request is approved by Company Engineering.*
 - *Practicality of testing Fabricated Assemblies in place shall be taken into consideration. Considerations shall include but are not limited to, the following:*
 - *Worker Safety (including nitrogen testing hazards)*
 - *Public Safety (including overlap of exclusion areas and public areas such as roads, etc.)*
 - *Reduction in pipe stresses*
 - *Facility or assembly complexity*

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17.5.8 *Identify all welded joints which are to be completed after pressure test and will therefore not be pressure tested. All tie-in welds shall be reviewed by and approved by Company Engineering.*

- *Use of pre-tested pipe for mainline replacement under 170 feet in length shall be allowed. The welds used to install those segments will not require additional pressure testing. All welds made to install pre-tested pipe shall receive 100% NDE in accordance with MS-ENG-040 Section 16: Non-Destructive Testing (NDT) prior to being put into service.*
- *Use of pre-tested joints with untested welds beyond 170 feet in length shall be prohibited.*
- *Tie-In welds for mainline pipe replacement beyond 170 feet in length shall be limited to two (2) welds per existing System. Additional tie-in welds shall only be authorized by the Company Director of Engineering and Director of Construction and a deviation request is approved in accordance with MS-ENG-040 Section 04: Specification Deviation Process.*
- *Tie-in welds for Fabricated Assemblies with a valid pressure test or MAOP establishment shall be limited to a minimum number based upon the design of the assembly.*
- *Tie-In welds are not permitted in any locations that will cause heat affected zones to overlap.*
- *All welds identified as Tie-In welds shall receive 100% NDE in accordance with MS-ENG-040 Section 16: Non-Destructive Testing (NDT) prior to being put into service.*

Allegation #2: DT Midstream's Construction Specification MS-ENG-040, Section 17 – Pressure Testing requires modification to properly describe an acceptable length of a short section.

No Contest

Explanation: The definition of "Short Section in DTM's Construction Specification Section 17 – Pressure Testing has been revised to the following:

"Any section of pipe(s), fitting(s) or fabricated assemblies, totalling less than 170 feet in length which can be visually inspected throughout the entire duration of the test."

In light of PHMSA's acceptance of Panhandle Energy's NOA response in 2011 (CPF 3-2010-1006M) of up to seven (7) pipe joints as a short section, DTM feels we are now well within an established acceptable length for short segments.

Allegation #3: DT Midstream's Transmission Integrity Management Plan (TIMP) does not address the time frame for integrating newly identified segments or HCAs into the Baseline Assessment Plan as required by § 192.911(a).

Contested

Explanation: DT Midstream's TIMP Procedure 902 – *High and Moderate Consequence Area Identification*, Section 5.3 (May 2021) specifically states the following:

New HCA and MCA identification will follow this procedure. If a new HCA or MCA is identified, it must be incorporated into Form 903-001, the Company's Baseline Assessment Plan (BAP), within one (1) year from the date the area is identified, and a baseline assessment will be completed within ten (10) years from the date the HCA or MCA was identified.

DT Midstream maintains that our TIMP Procedure 902 successfully addresses the time for integration of newly identified segments/HCAs into the Baseline Assessment Plan. DT Midstream would request that this allegation be removed from the final NoA letter.

Allegation #4: DT Midstream's Transmission Integrity Management Plan does not address the requirement to comply with the requirements of ASME/ANSI B.31.8S, Section 12. Specifically, DTM's TIMP failed to identify documentation requirements for internal auditing for quality assurance, as required by § 192.911(l).

No Contest

Explanation: DT Midstream's TIMP Procedure 901 – *Quality Control Plan*, Sections 7 & 8 specify that the results of Internal Auditing, as well as the other components and reviews included in the **Annual Integrity Management Review and Report** are to be documented on DTM TIMP Form 901-002. Form 901-002 already has an entry line on Sheet 1 for "Reviews" which includes "Audits, Evaluations, Etc". as well as "Findings". A reference to the TIMP Procedure 908, *Performance Plan* is also referenced. To further clarify our process and documentation, Sheet 3 has been added to this form to allow for more transparency when listing audit findings and tracking of how they are addressed.

Allegation #5: DT Midstream's Transmission Integrity Management Plan does not address the requirement to define a process for defining the responsibility and the qualifications of individuals reviewing assessments via pressure test, as required by § 192.907(a) and § 192.915.

No Contest

Explanation: DT Midstream's TIMP Procedure 901 – *Quality Control Plan*, Section 5.1 has been revised to include the following wording:

"Assessment personnel. Those conducting assessments (e.g., hydrotest, corrosion inspection) and evaluating results must meet appropriate training, experience, and qualification criteria. For ILI evaluations, a minimum qualification of Level III ILI Data Analyst per ANSI/ASNT ILI-PQ 2005 (2010) is necessary. Personnel reviewing and accepting hydrotesting assessment results shall be qualified through a mixture of training and/or experience with the application of hydrotesting standards as outlined in ASME B 31.8. This will include at least three (3) years of ASME B 31.8 experience. A professional engineer's license may be substituted for the required experience."

DTM believes these changes addresses PHMSA's requirements. DTM remains committed to the safe operation of its pipeline system. Please feel free to contact me if you have any questions.

Sincerely,

Mr. Christopher Zona
Chief Operating Officer, DT Midstream

Attachment: DTM TIMP Form 901-002

Cc: Philip Coleman, DTM Director of Codes & Regulatory
Patrick Raichel, DTM Manager of Codes & Compliance

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