



Northern Natural Gas Company
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January 14, 2025

Gregory Ochs – Director
PHMSA – Central Region
901 Locust Street, Suite 480
Kansas City, MO 64106

Re: CPF 3-2024-070-NOA

Dear Mr. Ochs,

In response to a Notice of Amendment (NOA) dated November 6, 2024, Northern Natural Gas (Northern) submits the following. Each of the issues is listed below followed by (Northern's) response.

The PHMSA issues from the NOA are quoted in italics with the Northern response following in plain text. Updated procedures are attached

Item 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.

NNG's Operations and Maintenance (O&M) Procedure, entitled "010.108 Procedure Review" (O&M 010.108), was inadequate because it did not provide adequate detail regarding the periodic review of work done by operator personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance, as required by § 192.605(b)(8). Specifically, the procedure did not: (1) prescribe how to document what work was reviewed and (2) did not contain requirements to ensure that each procedure used by NNG would be periodically reviewed. First, the documentation requirement contained in O&M 010.108 was inadequate because it only required NNG to generate a list of what procedures were reviewed, and did not prescribe the information to be captured about what work was reviewed. After reviewing NNG's records, PHMSA confirmed that the result of the review constituted merely generating a list of procedures

that were reviewed annually. Per O&M 010.108, and the associated list of procedures which were reviewed by NNG in 2021, 2022, and 2023, PHMSA found that NNG did not have a process for documenting work that was performed as part of the review. O&M 010.108 must be revised to include detailed documentation requirements to record what work was performed during the process of reviewing each procedure, such as, but not limited to: 1. Dates, times, and locations of work reviewed; 2. OQ tasks qualifications and training related to the performance of the maintenance or operating procedure; 3. Critical tools and equipment used in the performance of the activity; and 4. Relevant pipeline system component or manufacturer data or guidance used in the course of the procedure. Second, O&M 010.108 was inadequate because it did not contain requirements regarding when to perform a periodic review of each procedure. NNG's policy was to review a listing of 18 frequently used procedures each year, as shown by "Table 1" of O&M 010.108. The chosen procedures are selected based on "number of inquiries received regarding the procedure, the number of related Maintenance Control System (MCS) tasks, frequency of tasks and any recent changes to the procedure," per section 5.2.1.1. However, no guidance or timeline was given for when to review less common procedures. From a review of procedures provided to PHMSA during the inspection, PHMSA determined that NNG had 195 unique procedures of which NNG's records showed that only 22 procedures had been reviewed for effectiveness from 2021 to 2023. Because O&M 010.108 failed to ensure each procedure is reviewed according to a defined time period, it must be revised to include a maximum period of time for the review of each procedure that is performed.

Northern Response:

Revised procedure 10.108 and new appendix 10.108a are attached for review.

Item 2

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

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NNG's O&M Procedure, entitled "160.101 Valve Maintenance" (O&M 160.101), was inadequate because it did not provide adequate detail regarding partial operation, pursuant to § 192.745(a). Specifically, O&M 160.101, section 5.1, stated only that "NNG personnel must ensure valves operate partially" and that NNG personnel must ensure that the valve indicator moves. After reviewing this procedure, PHMSA found in practice NNG personnel defined "partial operation" to mean a minimal movement of the valve position indicator, which was not sufficient to ensure that the valve was unseated from the closed position. NNG must amend the procedure such that each type of valve has a defined partial

operation range of movement that ensures it is operational, per the requirements of § 192.745(a).

Northern Response:

The Maximo application was revised to add lines 7 and 8 to record this information for valve maintenance tasks. Northern revised operating procedure 160.101, Valve Maintenance, to define partial operation of a valve during annual maintenance. See revised operating procedure 160.101, attached.

Long Description

160.101 - CHECK, OPERATE, LUBRICATE

1. CONTACT GAS CONTROL PRIOR TO STARTING WORK CALL TIME: _____ CONTROLLER NAME:

2. AS FOUND - OPEN / CLOSED (CIRCLE ONE)

3. CHECK VALVE AND OPERATOR (IF ANY) FOR LEAKS OR VISUAL SIGNS OF LOOSENESS.

4. VERIFY EVERY VALVE IS PROPERLY SECURED, LABELED AND, WHERE REQUIRED, A VALVE WRENCH IS PROPERLY STORED AND AVAILABLE.

5. AS LEFT - OPEN / CLOSED (CIRCLE ONE)

6. CONTACT GAS CONTROL WHEN DONE WITH WORK CALL TIME: _____ CONTROLLER NAME.

7. LOG PERCENT OF VALVE TRAVEL DURING ANNUAL MAINTENANCE. _____

8. RECORD THE ALTERNATIVE VALVE, IF FOUND INOPERATIVE AND TAG IT.

Reset Clear

OK Cancel

Figure 1- Added line 7 to the job plan in Maximo.

Item 3

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NNG's O&M procedure for each alternative equivalent technology, entitled "160.201 Rupture Mitigation Valves," was inadequate because it did not include all the requirements specified in § 192.745(d). Following PHMSA's inspection, NNG amended the procedure and found to be acceptable. Therefore, no further action is needed by NNG.

Northern Response:

As noted above, procedure was amended, and no other action is required.

Item 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 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.

NNG's procedure for maintaining gas detection and alarms in compressor stations, required under § 192.736(c), was inadequate because it failed to provide adequate detail for recording performance tests, as required by § 192.605(a). Specifically, O&M Procedure, entitled "030.102 Compressor Stations Additional Safety Devices" (O&M 030.102), section 6, specified that NNG must "record data from tests." However, PHMSA found that not all data was recorded from the results of tests because NNG's MCS did not include a way to record results from performance tests of each specific device. In some instances, multiple device tests in a single compressor station location were recorded only by a single check mark, or signature, on a form created by local personnel. During PHMSA's inspection, NNG stated that the procedure and form will be revised in the second half of 2024 for recording the results. NNG must amend its written procedures to comply with the requirements of § 192.736(c) to ensure that all relevant data from maintenance and performance tests are documented.

Northern Response:

Northern has created standard forms to be used throughout the company to record data. Draft copies are attached.

Item 5

§ 192. 605 Procedural manual for operations, maintenance, and emergencies.

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parts of the manual must be kept at locations where operations and maintenance activities are conducted.

NNG's O&M Procedure, entitled "010.310 Management of Change" (O&M 010.310), was inadequate because it failed to include the requirement for the 30-day notification to PHMSA OPS after adopting a substantial change to the program, per the requirements of § 192.909(b). Specifically, O&M 010.310, section 3.2.5, "Communication to affected parties," stated that NNG must "identify who will make notification of the changes and who will be notified of the changes," but failed to include notification to PHMSA OPS within 30 days if the change is substantial. The procedure was amended after the inspection and found to be acceptable. Therefore, no further action is needed by NNG.

Northern Response:

As noted above, procedure was amended, and no other action is required.

Attachments

Operating Procedure 10.108, Procedure Review

Operating Procedure 10.108a, Appendix A: Periodic Review of Work Determining Effectiveness and Adequacy

Operating Procedure 30.102, Compressor Stations Additional Safety Devices

Operating Procedure 30.102a, Appendix A: Fixed Gas Detection System Quarterly Inspection Form

Operating Procedure 30.102b, Appendix B: Fixed Gas Detection System Annual Calibration Form

Operating Procedure 30.102c, Appendix C: Fixed Gas Detection System 5-Year Wiring Test Form

Operating Procedure 30.102f, Appendix F: Fire Detection System Quarterly Inspection Form

Operating Procedure 30.102g, Appendix G: Fire Detection System Annual Test Form

Operating Procedure 30.102h, Appendix H: Fire Detection System 5-Year Wiring Test Form

Operating Procedure 160.101, Valve Maintenance

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

Sincerely,

7 Correll

Thomas Correll
Vice President
Pipeline Safety and Risk