



1100 Louisiana, Suite 3300
Houston TX 77002



March 19, 2008

Mr. Rodrick M Seeley
Director
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
8701 South Gessner, Suite 1110
Houston, TX 77074

RE: Notice of Amendment CPF 4-2007-1014M

Dear Mr. Seeley:

On September 11, 2007, representatives of the the Pipeline and Hazardous Material Safety Administraion (PHMSA), conducted an inspection at the Enbridge Energy Company (Enbridge) Operator Qualification (OQ) Plan in Houston, Texas.

Pursuant to the PHMSA inspection, on December 5, 2007, Enbridge received the above referenced Notice of Amendment (NOA). Enbridge requested and was granted an extension to respond to the NOA. This letter serves as Enbridge's formal response to the notice.

Item #1: Enbridge's OQ Plan needs to specify covered tasks that may be performed by third party personnel qualified through MMS T2 certification (49 CFR 192.805(a)).

Response: Section 5.0 Third Party Entities of the Enbridge OQ Plan allows for the use of mutual assistance from other companies to perform covered tasks. Enbridge has identified the covered tasks and third party entities that perform those tasks under the MMS T2 certification. A copy of the Enbridge Third Party Entity form with this information is attached.

Item #2: Enbridge's OQ Plan needs provisions to:

- Specify the criteria for pass/fail for performance evaluations

Response: Section 3.1 Initial Qualification (paragraph 3) has been amended to reflect Enbridge's requirement that all steps contained within a performance evaluation must be completed successfully in order to be considered for qualification. This change was made during the PHMSA inspection and found to be acceptable by the inspectors at the time.

- Ensure covered tasks are broken down into subtasks or the individual is assessed on all the elements of the task and not allow individuals to complete partial evaluations for a task and be qualified for the full task

Response: Enbridge has conducted a thorough review of the covered task list and determined that tasks 1, 8, and 36 could be divided into subtasks. The Enbridge OQ Plan has been updated to reflect these changes. A copy of the plan is attached.

Old Task	
CT01	Conduct Annual Cathodic Surveys
CT08	Cathodic Protection Remediation
CT36	Performing General Pipeline Repair Activities
New Tasks	
CT01 – 1.1	Conducting Annual Cathodic Surveys and Measuring Structure-to-electrolyte Potentials
CT01 – 1.2	Reserved
CT01 – 1.3	Performing Close-interval Surveys
CT01 – 1.4	Detecting Interference
CT01 – 1.5	Testing to Detect Electrical Isolation
CT01 – 1.6	Inspecting and Electrically Testing Bonds
CT08 – 8.1	Installing Electrical Bonds
CT08 – 8.2	Installing Galvanic and Impressed Current Anodes
CT08 – 8.3	Performing Transformer / Rectifier Installations
CT08 – 8.4	Performing Test Station Installations
CT08 – 8.5	Performing Thermite Welding Procedures
CT08 – 8.6	Conducting Electrolyte Resistivity Measurements
CT08 – 8.7	Locating Shorted Casings

CT36 – 36.1	Performing General Pipeline Repair Activities
CT36 – 36.2	Installing Welded Tight-fitting Sleeves (Split Repair Sleeve)
CT36 – 36.3	Installing Oversleeves
CT36 – 36.4	Installing Composite Wrap Sleeves
CT36 – 36.5	Installing Mechanical Split Sleeves
CT36 – 36.6	Installing Mechanical Couplings
CT36 – 36.7	Performing Hot Tapping
CT36 – 36.8	Inserting Plugs

- Address re-evaluation intervals and evaluation methods for individual qualifications accepted through a merger or acquisition

Response: Section 1.7 Mergers and Acquisitions (paragraph 2.a.) has been amended to include an assessment of the intervals and methods in which acquired employees were qualified. This change was made during the PHMSA inspection and found to be acceptable by the inspectors at the time.

- Address the need for performance evaluations for covered tasks identified as difficult to perform specifically for the qualifications accepted through EwebOQ. EwebOQ currently does not use performance evaluations as an evaluation method.

Response: Section 7.5 Appendix E Task Analysis has been amended to eliminate the option for EwebOQ for contractor qualifications on any covered task that requires a performance evaluation.

- Ensure performance evaluations for each covered task include evaluation of all elements required to perform the covered task.

Response: Enbridge has conducted a thorough review of the tasks that require performance evaluation. Section 7.6 Appendix F Enbridge Task-Specific Evaluations has been amended so each task that requires a performance evaluation includes the steps necessary to evaluate successful performance of those tasks.

- Ensure that task specific evaluations use consistent evaluation methods for contractors who are qualified using QQSG, EwebOQ and NCCER. The OQ Plan currently requires written/CBT assessments and performance evaluations/verifications for QQSG and NCCER but only requires a written/CBT assessment for EwebOQ.

Response: Section 7.5 Appendix E Task Analysis has been amended to eliminate the option for EwebOQ for contractor qualifications on any covered task that requires a performance evaluation.

- Ensure that annual visual acuity exam reports for NDT II level certifications are listed as a requirement for current qualification

Response: Non-Destructive Testing covered tasks CT66 Performing NDT Dye Penetrant, CT 67 Performing NDT X-Ray, and CT68 Performing NDT Magnetic Flux have been amended to require annual visual acuity exam reports in addition to industry certification.

- Ensure AOC's listed on the Enbridge Task Specific Evaluation forms used by evaluators during evaluations include reactions that are to be taken when each AOC is encountered.

Response: Section 7.6 Appendix F Enbridge Task-Specific Evaluations has been amended so that each AOC has a desired response action. The evaluator has a check box to verify successful understanding of the AOC and desired response action of the person being evaluated.

- Ensure that reactions to AOC's by Contractors are addressed when different than reactions to AOC's by company employees.

Response: Enbridge has reviewed the AOC's and desired responses listed for each covered task in Section 7.6 Appendix F Enbridge Task-Specific Evaluations. The desired responses are consistent with those expected for Enbridge employees and contractors.

This is Enbridge's detailed response and request that should you have any questions, please feel free to contact me at (713) 353-6369.

Included is an electronic copy of the amended Enbridge OQ Plan.

Sincerely,



Gregg Johnson
Regulatory Compliance Specialist

Attachments:

1 CD copy of Enbridge OQ Plan
Form 7.7.3 Mutual Aid Form for T-2 certification

Cc:

David McQuade Enbridge

7.7.3 - Mutual Aid Form

Enbridge TS has identified the following companies to perform activities on, or affecting Enbridge facilities.

	COMPANY NAME
1.	Shell Platforms WD 143, GB 128, GC 65, GC 19, ST 300
2.	BP MP 260
3.	Apache Platforms VK 780, SS 259, GI 116
4.	Conoco Phillips GB 783
5.	BHP Billington GC 613
6.	
7.	
8.	

Enbridge has reviewed the evaluation methods used by the companies noted above to qualify persons in the following tasks and has determined that these qualification requirements are acceptable alternative methods for evaluating qualifications to perform these tasks on Enbridge assets.

	COVERED TASK	COMPANY & DATE REVIEWED QUAL. REQ.
1.	CT 41 Pig Launching	3-17-08
2.	CT 22 Valves	3-17-08
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		