CITY OF SUSANVILLE
PUBLIC WORKS DEPARTMENT
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February 8, 2011

Chris Hoidal
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

Reference to CPF 5-2011-0001M

Dear Mr. Hoidal:

The City of Susanville has enclosed the following information regarding the Notice of Amendment to our Operations and Maintenance Procedures Manual. We have provided responses to describe the inadequacies found.

Sincerely,

Dale Moore
Natural Gas Utilities Supervisor

1. §192.227 Qualification of welders

(A) Except as provided in paragraph (b) of this section, each welder must be qualified in accordance with section 6 of API 1104 (incorporated by reference, see § 192.7) or section IX of the ASME Boiler and Pressure Vessel Code (incorporated by reference, see § 192.7). However, a welder qualified under an earlier edition than listed in § 192.7 of this part may weld but not re-qualify under that earlier edition.

City of Susanville requires its welders to be qualified but failed to be specific in its welding procedures "how to qualify welders." Welding must be performed by a qualified welder in accordance with section 6 of API 1104 or section IX of the ASME Boiler and Pressure Vessel Code

Response: City of Susanville Welder Qualifications appears in the City of Susanville Operations & Maintenance Plan Manual In Section "N" titled Qualification Testing/Welding, Initial Test Requirements N - 3.2, and Re-qualification N - 3.3 dated 6/30/2004 the use of API 1104. It does not indicate the 20th Edition and this section is currently under review. We have attached a copy of the procedures for your convenience.

2. §192.485 Remedial measures

(C) Under paragraphs (a) and (b) of this section, the strength of pipe based on actual remaining wall thickness may be determined by the procedure in ASME/ANSI B31G or the procedure in AGA Pipeline Research Committee Project PR 3-805 (with RSTRENG disk). Both procedures apply to corroded regions that do not penetrate the pipe wall, subject to the limitations prescribed in the procedures.

City of Susanville has corrosion protected procedures but did not have procedures of how to determine the remaining wall strength if localized corrosion has reduced the pipe's wall thickness. The actual remaining will thickness may be determined by the procedure in ASME/ANSI B31G or the procedure in AGA Pipeline Research Committee Project PR 3-805 (with RSTRENG disk.)

Response: The City of Susanville understands the importance and are now currently doing research to determine the wall strength for localized corrosion. A procedure will be developed and inserted in our Operation & Maintenance Plan. We are requesting 6 months to complete this addition to our O & M Plan.

3. Public Awareness

(G) The program must be conducted in English and in other languages commonly understood by significant number and concentration of the non-English speaking population in the operator's area.

Public Awareness Program must be conducted in English and any other languages commonly understood by significant number of population in operator's area. Operator admits that there are Spanish speaking residents in its area, but the public awareness information is currently issued in English only.

Response: After carefully reviewing other City of Susanville documents, notices, and publications it has been determined that the commonly understood language in this area is English and that there is not a significant concentration of Non-English speaking population located in Susanville or along the pipeline. We will continue to monitor for Non-English speaking languages and currently conduct our Public Awareness Program in English.

4. § 192.619 Maximum allowable operating pressure - Steel or plastic pipelines

(C) No persons may operate a segment of stell or plastic pipeline at a pressure that exceeds

a maximum allowable operating pressure identified by the lowest of the following:

(1) The design pressure of the weakest element in the segment, determined in accordance with subpart's C and D of this part. However, for steel pipe in pipelines being converted under § 192.14 or up rated under subpart K of this part, if any variable necessary to determine the design pressure under the design formula (§ 192.105) is unknown, one of the following pressures is to be used as design pressure:

(I) Eighty percent of the first test pressure that produces yield under section N5 of Appendix N of ASME B31.8 (incorporated by reference, see § 192.7), reduced by the appropriate factor in paragraph (a)(2)(ii) of this section; or (ii) If the pipe is 12 3/4 inches (324mm) or less in outside diameter and is not tested to yield under this paragraph, 200 p.s.i. (1379 kPa) gage.

(2) The pressure obtained by dividing the pressure to which the segment was tested after construction follows:

(I) For plastic pipe in all locations, the test pressure is divided by a factor of 1.5
(Ii) For steel pipe operated at 100 p.s.i. (689 kPa) gage or more, the test pressure is divided by a factor determined in accordance with the following table:

Class Location	Segment Installed Before Nov. 12 1970	Segment Installed After Nov. 11 1970	Segment Converted under § 192.14
1	1.1	1.1	1.25
2	1.25	1.25	1.25
3	1.4	1.5	1.5
4	1.4	1.5	1.5

City of Susanville in its O & M manuals identified the Maximum Allowable Operating Pressure (MAOP) of its system at three separate locations but failed to show which process has been used to establish these MAOP's. The MAOP from Tuscarora tie-in to the first regulator is 900 p.s.i, from the 2nd regulator to the City Gate is 360 p.s.i., and downstream of the City Gate (PE pipe) is 60 p.s.i. No information on how these MAOP' were established.

Response: Our test records show that MAOP from the Tuscarora tie-in point to City Gate was tested at 1.5 times MAOP. Pressure test records indicated test was performed on 9/13/2001 at 1500 psig with H20 for 24 hrs establishing an MAOP of 1000 psig.

However, in our O & M plan section H 3.1 paragraph G that lines that will operate over 60 psig will be developed by an engineer, this section is presently being reviewed.

Downstream from City Gate (PE Pipe) MAOP was established with test procedures in Section H 3.1 A & B of operating & Procedures Plan at 1.5 times MOAP. Pressure tests are on file for review. We have enclosed a copy of the above procedures for your convenience.

PROCEDURES
PRESSURE TESTING

3.0 PURPOSE

The purpose of this section is to establish minimum procedures for the leak and strength testing of gas pipeline facilities.

3.1 PRESSURE TESTING

Pressure testing plastic mains and service lines, and steel mains and service lines operating at or below 60 psig shall be tested as outlined below:

A. Lines Smaller Than 2" IPS

1. 0 – 100 feet – 10 minutes
2. Over 100 feet – 1 hour

B. 2" Lines and Larger

1. 0 – 1000 feet – 2 hours
2. Over 1000 feet – 4 hours. Not to exceed 8 hours.

B. All above pressure test shall be performed at a minimum of one and one half times the MAOP or a minimum of 90 psig. Recommended test pressure 100 psig.

C. Pressure recording charts shall be used to record the data on any tests exceeding two hours.

D. When pressure testing facilities with pipe sizes in both above groups, the total distance of all pipe shall be included in the higher group.

E. For single components, pre-fabricated assemblies and short sections (less than 125 ft.) of pipe, mixing of test mediums is permissible. (such as nitrogen to top of water)

F. Pipeline facilities to operate above 60 psig shall be tested in accordance with plans developed by the engineer.

G. Prefabricated assemblies shall have a pressure stand-up test.

PROCEDURES
QUALIFICATION TESTING / WELDING

PURPOSE
This section establishes the minimum requirements for qualification in shield metal arc welding (SMAW) procedures by which personnel will be deemed qualified to weld with these electric arc processes.

SCOPE

A. Before starting the qualification test, the welder shall be allowed a reasonable time to adjust the welding equipment for the test.

B. The welder shall use the same welding technique and proceed with the same speed that he will use if he passes the test and is permitted to do production welding.

3.2 INITIAL TEST REQUIREMENTS

A. Initial testing should be conducted by a **Qualified Third Party**

B. The qualified representative conducting the test shall visually inspect the process to ensure that the welder follows the qualified welding procedure. (API 1104 will be used in the standard.)

C. Operator welders shall initially qualify for arc welding under API 1104, Standard on pipe having a diameter of 6.625" and wall thickness of .250".

3.3 REQUALIFICATION

A. Biannual tests are required for all electric arc welders. Test shall be at intervals not to exceed six months from the last date of qualification or requalification.

B. This may be a production weld or a sample weld.

3.4 REJECTION CRITERIA

1. Electric arc welders taking the requalification or initial test shall have the test weld found acceptable if it meets the requirements the API 1104 standard.