

NORTH SLOPE BOROUGH

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April 12, 2019

Mr. Chris Hoidal, P.E.
Director, Western Region
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

RE: CPF 5-2019-0007M

Dear Mr. Hoidal:

On January 25, 2019 the Pipeline and Hazardous Materials Safety Administration (PHMSA) issued a Notice of Amendment (NOA) to the North Slope Borough (NSB). The NOA indicated five areas to implement amended procedures.

As described in more detail below, NSB is submitting amended procedures to address the items identified in the NOA.

Item 1:

§192.241(a) Inspection and test of welds. a) Visual inspection of welding must be conducted by an individual qualified by appropriate training and experience to ensure that:....

The NSB welding procedure does not specify what level of training and experience is required to qualify individuals to conduct welding inspection tasks.

Please see Attachment #1: *NUI Dist. OM Procedures Rev 7 April 2019 Procedure P-192.225: Pipeline Welding* (page #96) for updated procedure and OQ requirements for visual inspections of welds are included in Attachment #2: *NSB Distribution OQ - Rev 7 April 2019 section CT76 – NDT Visual Inspection* (page #324).

Item 2:

§ 192.615 Emergency Plans. (a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following: ... (4) The availability of personnel, equipment, tools, and materials, as needed at the scene of an emergency.

The NSB procedures do not provide inventories of required emergency response equipment, tools, and materials as needed at the scene of an emergency. The NSB procedures must define the required emergency response equipment, tools, and materials that will be maintained at NSB's facilities. The procedures should include a process to confirm that the quantities of all equipment, tools, and materials listed on the inventory are available during an emergency.

Please see Attachment #1: NUI Dist. OM Procedures Rev 7 April 2019 Procedure P-192.615: Emergency Response (page #274) and Attachment #3: NUI DIST PSOM Rev8 section 13: EMERGENCY RESPONSE PROCEDURES (page #47) for details. Both manuals describe the equipment, location, and quantity of emergency response materials. There is also a process described in Attachment #3 to ensure that all emergency equipment is inspected and available.

Item 3:

§ 192.615 Emergency Plans.

...(b) Each operator shall: ...

(2) Train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that the training is effective.

The NSB procedures do not identify how appropriate NUC operating personnel are trained with respect to NSB's emergency procedures, or how NSB verifies that such training is effective. NSB procedures must identify how appropriate operating personnel are trained in NSB's emergency procedures, and how NSB verifies that such training is effective.

Please see Attachment #1: NUI Dist. OM Procedures Rev 7 April 2019 Procedure P-192.615: Emergency Response (page #274). The procedure dictates that training shall be completed at least 2 times per year. A training roster is included to document the training. Also, the section Training Effectiveness details how the NSB will determine if the training was effective or not.

Item 4:

§ 192.605 Procedural Manual for Operations, Maintenance, and Emergencies.

...(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations. ...

(2) Controlling corrosion in accordance with the operations and maintenance requirements of subpart I of this part.

NSB's procedures do not contain a procedure to address further examination of exposed buried pipe in instances where external corrosion is discovered and the discovered corrosion requires specific remedial action. Subpart I of part 192, specifically § 192.459, requires the following: "Whenever an operator has knowledge that any portion of a buried pipeline is exposed, the exposed portion must be examined for evidence of external corrosion if the pipe is bare, or if the coating is deteriorated. If external corrosion requiring remedial action under § 192.483 through 192.489 is found, the operator shall investigate circumferentially and longitudinally beyond the exposed portion (by visual examination, indirect method, or both) to determine whether additional corrosion requiring remedial action exists in the vicinity of the exposed portion." NSB's

procedures are silent in this regard, and are therefore inadequate to assure the safe operation of the pipeline. NSB shall amend its procedures to provide clear direction for what additional examination tasks are required in instances where external corrosion requiring remedial action is discovered.

Please see Attachment #1: NUI Dist. OM Procedures Rev 7 April 2019 Procedure F-192.709: Leak Investigation / Repair and Exposed Pipe Report (page #143). The procedure/form has been amended to include the following to determine the extent of corroded pipe using direct examination methods:

3. If corrosion of any kind is found or the coating is found to be damaged, forward a copy of this report to the NSB Program Manager.

3.1) If external corrosion is found continue to excavate to determine the extent of the external corrosion. Continue to dig up to 10 linear feet in either direction from the original excavation. If the external corrosion continues past the 10 feet mark, contact the NUC/NSB Manager immediately to determine an engineered path forward.

Item 5:

§ 192.805 Qualification program

Each operator shall have and follow a written qualification program. The program shall include provisions to:

- (a) Identify covered tasks;**

NSB did not include all covered tasks in their operator qualification (OQ) program as required by §192.805. Specifically, our inspection of the OQ program noted that application of protective tape wrap, which meets the definition of a "covered task," was not included in the written qualification program. NSB must amend its written qualification program such that application of the protective tape wrap is identified as a covered task. All other tasks that may be expected to be performed on the distribution system and meets the definition of "covered tasks" as defined by §192.801(b) are required to be identified in the OQ program.

Please Attachment #2: NSB Distribution OQ - Rev 7 April 2019 section Task CT07 - 7.5.1: Corrosion Coating Application Using Hand Application Methods – Coating Wraps (page 105) for details regarding the covered task of applying wrap style coatings.

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Please contact us if you have any additional questions or concerns about the information provided in this letter. NSB appreciates your time and attention and looks forward to working with PHMSA in the future.

Respectfully,



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