

INTERMOUNTAIN GAS COMPANY

555 SOUTH COLE ROAD • P.O. BOX 7608 • BOISE, IDAHO 83707 • (208) 377-6000 • FAX: 377-6097

February 18, 2021

Mr. Darrin Ulmer, Programs Manager
Idaho Public Utility Commission
PO Box 83720
Boise, ID 83720-0074

Subject: Response to Area of Concern dated January 26, 2021 (Report # I202101)

Dear Mr. Ulmer,

This letter is intended to address one area of concern stemming from a January 25, 2021 on-site construction inspection of the 318-57FS-123 project located at 605 North 7th Street, Parma, Idaho in Intermountain Gas Company's (IGC) Nampa District. Specifically, we are addressing how we plan to bring the area of concern into full compliance.

AREA OF CONCERN

1. 49 CFR §192.605 (a) (1) 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.

Finding:

During the inspection it was noted that the DAS-CO welding crew employed by IGC, when asked about preheating prior to welding, did not have a operational and calibrated infrared pyrometer to check the preheat temperature at the weld groove and weld area as required by IGC Operations and Maintenance Manual procedure 4106.1 (1.16.1). This area of concern has been a previous issue brought to your company's attention.

Intermountain Gas Response

IGC acknowledges the Das-co of Idaho crew working at 605 North 7th Street in Parma on January 25, 2021 had an infrared pyrometer with an expired calibration date. Das-co was performing an in-service weld using Welding Procedure Specification (WPS) 6A which does not require preheat. (See Figure 1.) Step 1.15. of IGC standard operating procedure 4106 – Welding General Standards states, “*Preheating shall be in accordance with the WPS;*” therefore, step 1.16.1. was not required for this in-service weld.

To immediately address this area of concern, a Critical – Compliance Message has been resent to MDU Utilities Group personnel and Contractors from the Director, Operations Services. (See Figure 2.)

To determine the root cause of the area of concern and what additional remedial action is required, IGC is performing a comprehensive review of current construction inspection practices, Quality Control inspection practices, and Contractor equipment calibration tracking practices. IGC will respond in writing by May 28, 2021 with the results of this review and a schedule of the required remedial action(s).

EXECUTIVE OFFICES

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Please contact Josh Sanders at (701) 222-7773 with questions or comments.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Pat Darras".

Pat Darras
Vice President, Engineering & Operations Services
Intermountain Gas Company

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Figure 1
Welding Procedure Specifications 6A

EWI	
WELDING PROCEDURE SPECIFICATION NO.:	WPS 6A
REVISION:	4
DATE:	August 21, 2012
STANDARD:	API 1104 20 th Edition Appendix B
SUPPORTING PROCEDURE QUALIFICATION NO.(s):	6A PQR
REVISION:	4
WELDING PROCESS AND TECHNIQUE	
WELDING PROCESS:	Manual SMAW
WELDING CURRENT AND POLARITY:	Direct Current Reverse Polarity (DCRP)
VOLTS, CURRENT AND TRAVEL SPEED RANGES:	Table 1
MINIMUM REQUIRED HEAT INPUT:	Table 1
SHIELD GAS AND FLOW RATE:	N/A
WELDING POSITION:	All Positions
WELDING PROGRESSION:	Vertical-up
WELDING SEQUENCE:	Figure 1
TIME BETWEEN PASSES (maximum):	10 minutes
TECHNIQUE (stringer/weave):	Either
NUMBER OF PASSES (single/multi):	Multi-pass (as required)
INITIAL/INTERPASS CLEANING:	Power Brushing or Grinding as Required
PROCEDURE THERMAL SEVERITY LEVEL:	See Pages 3 and 4 for Procedure Applicability
BASE MATERIAL	
PIPE/SLEEVE GRADE:	All Pipe Grades Assuming Maximum Allowable CE _W is not Exceeded – See Pages 3 and 4 for Procedure Applicability
PIPE/SLEEVE MATERIAL CE _W :	See Pages 3 and 4 for Procedure Applicability
PIPE DIAMETER:	All Diameters
PIPE WALL THICKNESS:	All Wall Thicknesses Provided that Appropriate Wall Thickness Group is Selected – See Pages 3 and 4 for Procedure Applicability ⁽¹⁾
(1) Burnthrough risk shall be evaluated if the pipe wall is < 0.25-in. (6.4-mm)	
FILLER MATERIAL	
AWS CLASSIFICATION:	E7018
ELECTRODE DIAMETER:	3/32-in. to 1/8-in. (2.4-mm to 3.2-mm)
FILLER METAL GROUP:	3
AWS SPECIFICATION:	A5.5
PREHEAT AND POST WELD HEAT TREATMENT	
PREHEAT TEMPERATURE (minimum):	None ⁽²⁾
POST WELD HEAT TREATMENT TEMPERATURE AND TIME:	None
(2) 150°F (66°C) if required for moisture removal only	
JOINT PREPARATION AND CLAMPING	
JOINT TYPE:	Fillet Weld and Side-Seam Groove Weld (Figure 1) or Branch Connection
BACKING:	1/16-in. (1.6-mm) x 3/4-in. (19-mm) Mild Steel for Side-Seam Groove Weld
TYPE OF LINE-UP CLAMP:	External (as required)
REMOVAL OF LINE-UP CLAMP:	After Side-Seam Tacks are Completed
WPS 6A – Page 1 of 6	

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Figure 2
MDUG Critical – Compliance Message

CRITICAL – Compliance Message

Compliance Department – Utility Group

The following Compliance Message was previously sent to MDUG personnel and Contractors in 2020. A recent field inspection indicated that measures have not been taken in all areas of MDUG's service territory to adequately review and follow company specific heat fusion and welding preheat standards. The severity of this Compliance Message has been upgraded to CRITICAL. Please review with all affected personnel.

Subject: PLASTIC JOINING AND WELDING PROCEDURES

Description: A Utilities Group Contractor recently failed to check the heating tool surface temperature prior to making a butt fusion. A second Utilities Group Contractor failed to check the pre-heat temperature at the weld groove and/or weld area. This compliance message is intended to raise awareness of heat fusion and welding preheat guidelines.

Action Required: Review and follow your company specific heat fusion and welding preheat guidelines.

CNG

[CP 607 – PE Main and Service Construction](#)

Before fusing for the day, check the actual surface temperature of the heater plate or adapter surface with an accurate pyrometer.

[CNG 760 – Welding Standards](#)

CNG welding procedure specifications that require preheat include the phrase "or warm to the touch" and therefore do not require a pyrometer or temperature sticks.

IGC

[4027 – Plastic Qualifications and Joining](#)

Pyrometers are the preferred method to assure proper heating tool face temperature.

[4106 – Welding General Standards](#)

Preheat temperature shall be checked with a contact pyrometer or infrared pyrometer at the weld groove and weld area.

MDU/GPNG

[Gas Distribution Standards](#)

Pyrometers are the preferred method to assure proper heating tool face temperature. "Temperature sticks" are acceptable if used in accordance with manufacturer recommendations and if within their shelf life. When using temperature sticks, take precautions to prevent tool face contamination.

[1229 – Welding General Standards](#)

[1230 – In-Service Welding Procedure](#)

Preheat temperature shall be checked with a contact pyrometer or infrared pyrometer at the weld groove and weld area.

Please ensure that a **calibrated** pyrometer with current calibration records is used for heat fusion and welding preheat applications where required per company procedures.

Temperature Sticks may only be used where permitted.

MDU Utilities Group integrated plastic joining and welding procedures are tentatively slated for implementation in 2021.

