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September 23, 2021

Idaho Public Utilities Commission
Pipeline Safety Division
PO Box 83720-0074
Boise, Idaho 83720-0074

2021 SEP 27 AM 9:43
IDAHO PUBLIC
UTILITIES COMMISSION

Re: Pipeline Safety Evaluation
Reference Number: #N202101

Dear Mr. Bruce Perkins:

This letter is in response to the letter dated August 30, 2021, alleging four probable violations on the Northwest Gas Processing, LLC's pipeline facilities, herein called NWGP. Each is discussed below.

Item #1 – 192.605 Periodic Review of Operator Personnel

Finding: *NWGP has no record of periodic reviews done by operator personnel of normal operations & maintenance procedures to determine the effectiveness of the procedures or that they are being documented on a Form 26 or alternate method as required by their O&M procedures.*

NWGP agrees there is no record of a periodic review, but NWGP disagrees that it has violated 192.605.

192.605 allows the Operator to determine the appropriate time frame for a “periodic” review. Assessing relevant factors, an Operator may choose longer or shorter time frames as appropriate. In this case, the individuals operating the pipeline were qualified and trained through the Operator Qualification program in April and May of 2020. Because the initial OQ training occurred last year, NWGP believes a longer time period is justified.

During the pre-audit and audit, all three operator employees were assessed by Randy Shelton, a contractor with extensive OQ and operations knowledge. See the Form 26 attached.

Because the term “periodically” does not specify a time period, NWGP believes a review performed within 15-16 months of an initial training is appropriate. Additional reviews of operator personnel will occur periodically in the future.

Item #2 – 192.605 – O&M Designated Form

Finding: *NWGP has not documented the above inspections on Form-4 as required by their O&M procedures.*

NWGP agrees that the O&M 9.5 states that “reports of above inspections and tests [pressure relief valves] shall be documented on Form – 4 and retained...” and that the relief valve inspection was performed and documented on a form that was not the specified Form – 4.

A contract company performed the valve inspection as required but documented the inspection on the contract company's form, not NWGP Form – 4.

NWGP's O&M manual is updated to ensure there is no requirement to use a specific form and instead it references forms that *may* be utilized.

Item #3 – 192.706 Corrosion Control Records – Rectifier Readings

Finding: *NWGP personnel were not recording the voltmeter readings correctly as required by their O&M procedures.*

NWGP agrees that the records demonstrating adequate rectifier readings and corrosion protection were unclear and indicated a lack of understanding on behalf of the person taking the readings.

Subsequent hands-on training for the remaining employees who will be responsible for reading rectifiers has occurred, and follow-up field verification has occurred ensuring employees can both read rectifiers and record those readings properly.

Current rectifier and cathodic protection readings indicate adequate corrosion protection on NWGP facilities.

Item #4 – 192.63 Marking of Materials

Finding: *NWGP personnel could not show where this requirement is in their O&M procedures.*

NWGP agrees that the O&M manual did not include requirements for marking of materials in 192.63.

Due to the nature of the O&M manual being tied to a contract agreement, a company memorandum is being added to the physical O&M in order to satisfy this requirement.

See attached Memorandum.

Thank you for your time and consideration.

Sincerely,

Nathan Caldwell

/s/

Enclosures: (2)

Form 26

Memorandum

MEMORANDUM

September 1, 2021

RE: Addition to NWGP O&M Manual

The following is incorporated in Northwest Gas Processing, LLC's Operation & Maintenance Manual.

SCOPE

[§192.605(b)(1)]

This addition to the Operation and Maintenance Manual is to ensure pipeline construction complies with the requirements of part 192 Subpart, B Materials. All construction must comply with provisions outlined in DOT Part 192 and API-1104, as applicable. References to API-1104 apply to the Latest Approved Edition of the document.

MARKING MATERIALS

[§192.63]

Pipe and pipeline components, including but not limited to flanges, flange accessories, standard fittings, and tapping fittings, will be selected that will maintain the structural integrity of the pipeline under the pressure, temperature, chemical, and environmental conditions that are anticipated.

The pipe and pipeline components will meet the requirements of 192 Subpart B, and must be marked to indicate size, material, manufacturer, pressure rating, and temperature rating as appropriate.

For sour gas service, the material will meet NACE Standard MR-01-75 guidelines.

MARKING LIMITATIONS

[§192.63]

Surfaces of pipe and components that are subject to stress from internal pressure may not be field die stamped, and if any item is marked by die stamping, the die must have blunt or rounded edges that will minimize stress concentrations.

FORM 26

Periodic Review of O&M Procedures

Pipeline System NWGP

<p>Requirement: 192.605(b)(8) - Periodically reviewing the work done by operator personnel to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found. 192.605(c)(4) - Periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found.</p>			
Periodic Review	Procedure(s) Satisfactory	Deficiency Found	O&M Procedure Reviewed
Normal Operations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	yes
Abnormal Operations	<input type="checkbox"/>	<input type="checkbox"/>	
Safety Related Condition	<input type="checkbox"/>	<input type="checkbox"/>	
Emergency Response	<input type="checkbox"/>	<input type="checkbox"/>	
Method Utilized			
(Indicate the method used for the review of work performed.)			
<input checked="" type="checkbox"/> Performance in Field	<input type="checkbox"/> Mock Drill	<input type="checkbox"/> Classroom Setting	
<input checked="" type="checkbox"/> Regulatory Pre-Audit	<input type="checkbox"/> Regulatory Audit	<input type="checkbox"/> Hands On Training	
<input checked="" type="checkbox"/> Combined with OQ Eval.	<input type="checkbox"/> Other (Please Indicate)		
Recommended Action			
(Attach Addition Supporting Documentation, As Applicable)			
<p><i>Reading Rect: Sizer / Taking pipe to soil Readings / operating valves Installing marker signs.</i></p>			

Employee: JT DAVIS

Date: 8-22-21 / 8-26-21

Operations Manager: Randy Shelton
 CONSULTANT

Date: 8-22-21 / 8-26-21

FORM 26

Periodic Review of O&M Procedures

Pipeline System NWGP

Requirement: 192.605(b)(8) - Periodically reviewing the work done by operator personnel to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found. 192.605(c)(4) - Periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found.			
Periodic Review	Procedure(s) Satisfactory	Deficiency Found	O&M Procedure Reviewed
Normal Operations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	yes
Abnormal Operations	<input type="checkbox"/>	<input type="checkbox"/>	
Safety Related Condition	<input type="checkbox"/>	<input type="checkbox"/>	
Emergency Response	<input type="checkbox"/>	<input type="checkbox"/>	
Method Utilized			
(Indicate the method used for the review of work performed.)			
<input checked="" type="checkbox"/> Performance in Field	<input type="checkbox"/> Mock Drill	<input type="checkbox"/> Classroom Setting	
<input checked="" type="checkbox"/> Regulatory Pre-Audit	<input checked="" type="checkbox"/> Regulatory Audit	<input type="checkbox"/> Hands On Training	
<input checked="" type="checkbox"/> Combined with OQ Eval.	<input type="checkbox"/> Other (Please Indicate)		
Recommended Action			
(Attach Addition Supporting Documentation, As Applicable)			
Reading Rectifier / taking pipe to soil Readings / operating valves Installing marker signs			

Employee: TYLER HARTUNG

Date: 8-22-21 / 8-25-21

Operations Manager: Romy Sheldon
Consultant

Date: 8-22-21 / 8-25-21

FORM 26

Periodic Review of O&M Procedures

Pipeline System NWGP

<p>Requirement: 192.605(b)(8) - Periodically reviewing the work done by operator personnel to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found. 192.605(c)(4) - Periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found.</p>			
Periodic Review	Procedure(s) Satisfactory	Deficiency Found	O&M Procedure Reviewed
Normal Operations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<i>yes</i>
Abnormal Operations	<input type="checkbox"/>	<input type="checkbox"/>	
Safety Related Condition	<input type="checkbox"/>	<input type="checkbox"/>	
Emergency Response	<input type="checkbox"/>	<input type="checkbox"/>	
Method Utilized			
(Indicate the method used for the review of work performed.)			
<input checked="" type="checkbox"/> Performance in Field	<input type="checkbox"/> Mock Drill	<input type="checkbox"/> Classroom Setting	
<input checked="" type="checkbox"/> Regulatory Pre-Audit	<input checked="" type="checkbox"/> Regulatory Audit	<input type="checkbox"/> Hands On Training	
<input checked="" type="checkbox"/> Combined with OQ Eval.	<input type="checkbox"/> Other (Please Indicate)		
Recommended Action			
(Attach Addition Supporting Documentation, As Applicable)			
<i>Reading Rect: Sier/Taking pipe to Soil Readings/operating VALVES</i>			
<i>INSTALLING MARKER SIGNS</i>			

Employee: DAN JOHANEK

Date: 8-22-21 / 8-25-21

Operations Manager: Ronny Shelton
CONSULTANT

Date: 8-22-21 / 8-25-21