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October 14, 2020

Sean Mayo
Pipeline Safety Director
Washington Utilities and Transportation Commission
Pipeline Safety Section
621 Woodland Square Loop S.E.
Lacey, WA 98503

RE: 2020 Natural Gas Standard Inspection – PSE Lewis-Thurston Unit – (Insp. No. 8041)

Dear Mr. Mayo:

PSE received and reviewed your letter dated September 16, 2020 regarding the 2020 Lewis-Thurston audit. Pursuant to your request, the following is PSE's response to the two identified areas of concern.

Areas of Concern

1. 49 CFR §192.481 Atmospheric Corrosion Control: Monitoring

(b) During inspections the operator must give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water.

(c) If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion as required by §192.479

Finding(s):

During the field portion of the 2020 Lewis-Thurston inspection, it was noted that the pipe supports (steel hoop hold down) appeared to be touching the top of the 6-inch IP pipe attached to the 5th Ave bridge in Olympia WA. There was no evidence of corrosion product noted, however, the contraction and expansion of the steel line will eventually rub off the coating and expose the bare steel to atmospheric corrosion. As this area of your system is near salt water, it should be corrected before the next scheduled atmospheric inspection of this asset.

PSE Response:

PSE inspected the pipe, asset ID PBS-0317, on the 5th Avenue bridge in Olympia, WA on September 29, 2020. During the visit, PSE assessed all brackets (steel hoop hold down) supporting the pipe on the bridge crossing. One bracket that was found touching the pipe surface was adjusted so it is no longer in contact with the 6-inch IP pipe. There were no other integrity issues observed.

2. WAC 480-93-180 Plans and procedures.

(1) Each gas pipeline company must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the gas pipeline company's system. The manual must include plans and procedures for meeting all applicable requirements of 49 C.F.R. §§ 191, 192 and chapter 480-93 WAC, and any plans or procedures used by a gas pipeline company's associated contractors.

PSE's Gas Field Procedures 415.1200 Monitoring Atmospheric Corrosion Safety

General For gas vault entry, refer to Employee Safety & Health Program Appendix 6-10, "Confined Space Entry for Gas Vaults" for safe work practices.

Finding(s):

During the field portion of the 2020 Lewis-Thurston inspection, PSE's PI inspector described an atmospheric corrosion inspection (location in yellow below) in downtown Centralia which required entry into what appeared to be a confined space (see photo below):

PBS-0187 312.008 314.011 Railroad AVE AC INSPECTION-NORTH OF E MAPLE G1 1870431

Apparently PSE has an asset which passes through what was described as a box culvert for China Creek. This inspection should be vetted by appropriate safety personnel at PSE before the next scheduled inspection in order to ensure that appropriate confined-space entry safety precautions are being followed.

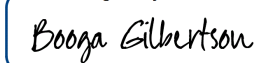
PSE Response:

PSE's Safety team performed a site evaluation and developed a confined space plan for use during atmospheric corrosion inspections of the IP steel pipeline that passes through a box culvert near China Creek in Chehalis. Please note that PSE confirmed the asset ID for this is PBS-0190, and the pipeline is located on Yew Street. The confined space plan includes requirements for checking atmospheric reads before entering the space and utilizing a two person crew to perform the inspection. The field personnel that will be performing this inspection will be trained on the confined space plan and the next scheduled inspection will be conducted in accordance with the plan within 30-days of completion of the training and no later than the inspection due date of December 31, 2020.

We trust the information provided is responsive to the findings of the UTC inspection. PSE is committed to constructing, operating, and maintaining a safe gas pipeline system.

Sincerely,

DocuSigned by:



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Booga K. Gilbertson

Sr. Vice President and Chief Operations Officer

Cc: Troy Hutson, Director Compliance
Kaaren Daugherty, Manger Compliance and Quality Management
Harry Shapiro, Director Gas Operations