

## LETTER OF CONCERN

December 7, 1999

### **CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Mr. Dan B. Martin  
Vice President, Operations  
Tennessee Gas Pipeline Company  
P.O. Box 2511  
Houston, TX 77252 - 2511

CPF No. 29107C

Dear Mr. Martin:

From October 18 - 22, 1999, a representative of the Southern Region, Office of Pipeline Safety (OPS) visited Tennessee Gas Pipeline's (TGP's) facilities in central and northern Tennessee and in southern Kentucky. Records were reviewed at your Lobelville, Centerville, and Portland, TN offices. The review disclosed some areas that are cause for concern.

#### **Facility Drawings and Schematics**

"As-built" engineering drawings for the below-listed completed projects were not found at the field locations, although corrected "red-lined" construction drawings were on file. Also, a "preliminary" engineering drawing was used for the 1999 TVA line tap valve installations in the Lobelville operating area (the drawing did not indicate that it had been approved for construction). The concern is that project drawings and schematics be administered, completed, and distributed in a timely process.

- 1998 class 3 pipeline segment replacement project (Portland operating area).
- Centerville meter station project (completed 12/10/69).
- Station 79 unit #8 cooling water pump/piping project

It was also suggested by the OPS inspector that one-line schematics of certain facilities may be helpful to field operating and maintenance personnel for identifying changes/divisions in the facility map design, operating pressure, over-pressure protection, ownership, operator responsibility limits, etc.

## **Damage Prevention & Public Education Efforts**

I encourage you to continue your efforts in educating excavators in pipeline damage prevention, and commend Lobelville for requiring detailed documented follow-up with excavators who do not attend TGP-sponsored excavator education meetings. I understand that the OPS inspector suggested that TGP also add into the Developer's Handbook (used for educating land developers along the pipeline in damage prevention and the one-call system), information on how to recognize and report a pipeline emergency.

I am concerned that the "Safety First" flyer that is currently used in your mass headquarter mail-outs to residents and excavators may not be as "desirable" to the public as the educational calendars that had been previously mailed out (and therefore, the safety messages may not be as readily conveyed and retained for future use by the public). I commend the Lobelville and Portland areas' practice of distributing educational calendars that contain more detailed safety educational material (such as local TGP addresses and phone numbers, specific one-call numbers) to residents and addresses in the near vicinity of the pipeline.

## **ESD Tests**

The maximum allowed time (15 months) between emergency valve tests was exceeded by 14 days on four (4) Lobelville station emergency shutdown (ESD) valves. Your procedures require these valves to be tested once each year in an ESD test, although the ESD procedure (COPP4-409) does not require the maximum 15 month time between tests. Your procedures need to be corrected to require ESD testing to not exceed 15 months between tests.

## **Relief Valve Review Process**

The 12/13/1998 regulator/relief valve inspection report and the 01/07/99 regulator/relief valve capacity report indicate different relief valve set-points for the Centerville "Only" meter station relief valve (458 psig vs. 450 psig, respectively). Although the relief valve is adequately sized and no other similar discrepancies were found, the concern is that your relief valve review process assures that current equipment set points are utilized.

## **Clockspring Notification Process**

This office received notification from TGP on September 16, 1999, that five Clockspring pipeline repair wraps had been installed on your system in Hickman County, TN. These installations had been installed in May, 1999, without prior notification as required of the Grant of Waiver: Repair of Gas Transmission Lines (Docket P-93-2W Notice 2). The prior notification allows for inspection of the Clockspring wrap installation by RSPA and state agencies. Daron Moore has assured us that the Clockspring management and notification process are being changed to prevent this from occurring in the future.

I understand that the above issues and comments were covered in the exit interviews with respective field management personnel, and were constructively received. I hope you also will consider these areas of concern and comments as constructive relating to pipeline safety, and consider them, as applicable, on a system-wide basis.

If we can answer any questions or be of any help, please call us at (404) 562 3530.

Sincerely,

Frederick A. Joyner  
Director, Southern Region  
Office of Pipeline Safety

cc: Compliance Registry, OPS headquarters