

LETTER OF CONCERN

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 17, 1998

Mr. Les Owen
British Petroleum Exploration (Alaska)
BP Pipelines
900 East Benson Boulevard
MB 11-5
Anchorage, Alaska 99508

CPF NO. 58704C

Dear Mr. Owen:

On November 18 and 19, 1997, a representative of the Western Region, Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code, conducted an inspection of your Milne Point Pipeline system. The inspection also included examination of operating and maintenance procedures and records related to this pipeline.

The facilities and records reviewed during this inspection revealed areas on your Milne Point Pipeline system that are cause for concern.

1. **§195.416(i) requires each operator to clean, coat with material suitable for the prevention of atmospheric corrosion, and, maintain this protection for, each component in its pipeline system that is exposed to the atmosphere.**

BP has determined they have areas of external corrosion on the pipeline. BP believes the cause of this corrosion is from water seeping through the insulation at the 'weldpack' seams and becoming trapped against the pipe. At the time of the inspection, BP was in the process of running a Real Time Radiography (RTR) Device to determine the extent and severity of the external corrosion. BP indicated they planned to inspect all locations where the RTR tool indicates significant corrosion and repair the pipe as necessary.

To help ensure all areas of corrosion are identified and inspected, we recommend that BP develop a written plan to address the external corrosion found on their Milne Point Pipeline. The plan should include at least the following information:

- a. Areas of corrosion identified by milepost or other appropriate method.
 - b. For each area of corrosion, indication of whether that area will be visually inspected, repaired, or monitored periodically.
 - c. Criteria to determine when to remove the insulation and inspect the corroded areas of the pipe.
 - d. Criteria to determine whether to repair the pipe or to simply suppress the active corrosion.
 - e. Methods to repair the pipe, when applicable.
 - f. Methods to suppress active corrosion, when applicable.
 - g. Methods to ensure the weldpack seams do not continue to allow moisture to be trapped against the pipe.
 - h. Plans for periodically reinspecting the pipeline for corrosion.
2. **§195.403(a) requires that each operator establish and conduct a continuing training program to instruct operating and maintenance personnel to:**
- (1) **Carry out the operating and maintenance, and emergency procedures established under §195.402 that relate to their assignments;**
 - (2) **Know the characteristics and hazards of the hazardous liquids or carbon dioxide transported ...;**
 - (3) **Recognize conditions that are likely to cause emergencies, predict the consequences of facility malfunctions or failures and hazardous liquid or carbon dioxide spills, and to take appropriate corrective action;**
 - (4) **Take steps necessary to control any accidental release of hazardous liquid or carbon dioxide and to minimize the potential for fire, explosion, toxicity or environmental damage.**

(5) Learn the proper use of firefighting procedures and equipment, fire suits, and breathing apparatus by utilizing, where feasible, a simulated pipeline emergency condition; and

(6) In the case of maintenance personnel, to safely repair facilities using appropriate special precautions, such as isolation and purging, when highly volatile liquids are involved.

While BP was able to demonstrate that many of its people have been trained, they were not able to verify that all of its personnel that may perform operations, maintenance or emergency work on the pipeline have been periodically trained to the requirements of §195.403(a).

We recommend that BP develop a system to ensure that all of its personnel that may perform operations, maintenance or emergency work on the pipeline are periodically trained to the requirements of §195.403(a). This system should include appropriate documentation of the training received by each individual.

We hope that you will consider these areas of concern and take action to further improve your present level of safety. If we can answer any questions or be of any help, please feel free to contact me at (303) 231-5701.

Sincerely,

Edward J. Ondak
Director

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