10/17/97

Donald J. Stursma, PE Supervisor, Engineering & Safety Section Iowa Utilities Board Lucas State Office Building Des Moines, Iowa 50319

Dear Mr. Stursma:

We have reviewed the Iowa Utilities Board's order granting the MidAmerican Energy Company a waiver of the corrosion control standards in 49 CFR 192.463(a) and 192.465(d). The waiver, which applies to about a mile of steel gas main located in downtown Des Moines, permits continued operation of the main without cathodic protection while it is replaced with plastic pipe over a 3-year period.

The order describes the good safety record of the main and the difficulties of providing adequate cathodic protection. In addition, the order indicates that during the period of the waiver the company will increase its system monitoring by conducting quarterly leakage surveys as well as monthly odor level tests. The order also requires the company to submit to the Utilities Board quarterly reports of the monitoring and replacement programs. Under these circumstances, we have no objection to the waiver.

Sincerely,

Richard B. Felder Associate Administrator for Pipeline Safety

LMFurrow:jmd:64046:10-3-97 cc: DPS-1,2,10,20,Regions TSIStateMailing