

LETTER OF CONCERN

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 17, 1998

Mr. William White
Vice President - Operations
Columbia Gas Transmission Company
1700 MacCorkle Avenue SE
Charleston, WV 25325-1273

CPF No. 18106C

Dear Mr. White:

On April 7-9, 1998, a representative of the Eastern Region, Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code (USC), conducted an onsite inspection of Columbia Gas Transmission Company (Columbia) natural gas transmission facilities and records in the Dranesville Area in Herndon, Virginia.

During the inspection, two items came to our attention that caused some concern. We hope you will give the following items your attention:

1. The main emergency shut down (ESD) valve #3215 on the 30-inch discharge line at the Loudoun compressor station can be operated manually and remotely actuated. The ESD valve housing and enclosure were recently painted. As a matter of routine inspection and operational assurance, our representative requested that the valve be partially operated manually.

To be manually operated, the enclosure that houses the lever had to be opened. Your personnel had difficulty opening the enclosure because the paint, on drying, sealed the lock and the enclosure's shutter to its body. Your personnel had to get a wrench to loosen the bolt type lock. The shutter was then pried open. After attaching the lever to the operating mechanism and pumping it, our representative also observed that the ESD's indicator plate offered resistance to its operation because dried paint sealed it to the valve housing.

Proper and unhindered access to the backup operating mechanism of ESDs are critical during an emergency situation.

2. Procedures for the operation and maintenance of compressor stations reside in Supplement 17 of the Manual of Approved Procedures for Operations (MAPO). This document was last revised on October 1, 1996, released on Columbia's intranet on January 23, 1997, and was followed by the distribution of a hard copy on February 5, 1997. However, personnel at the Loudoun compressor station had in their possession and were using the October 12, 1995-version.

The Loudoun compressor station is networked and can download information and updated policies and procedures from your intranet through a modem. However, it is good practice to routinely print revisions to maintain a current manual because all staff may not be familiar with the modem operating protocols and would therefore prefer hard copies.

The above items were discussed with your representatives during the inspection and at the exit interview. Your representatives indicated that these items would receive attention.

The Office of Pipeline Safety appreciates your attention to this matter and good faith efforts to promote continued safety in your organization. If we can answer any questions or be of any help, please contact me or my staff at (202) 366-4580. Thank you for your staff's cooperation during this scheduled inspection.

Sincerely,

William H. Gute
Eastern Regional Director
Office of Pipeline Safety

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cc: DPS-22.1, DPS-24, All Regions, NJDO, Chuck, Joy, Atif, Phillip
WV-PSC