

LETTER OF CONCERN

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 4, 2000

Mr. Walter Ferguson, Vice President of Operations
Reliant Energy Gas Transmission
1111 Louisiana, Room 760
Houston, Texas 77002

CPF No. 420001001

Dear Mr. Ferguson:

At approximately 8:00 am CDT, on December 22, 1999, Reliant Energy experienced a release of natural gas in Wilburton, Oklahoma. The release was not reported to The National Response Center in Washington, DC until 7:46 pm CDT (NRC Report #515184 enclosed). As a result of the lapse time between the discovery of the release and the telephonic notice, it appears that you have committed probable violation of pipeline safety regulations, Title 49, Code of Federal Regulations, Part 191. The probable violation is:

- 1. 191.5(a) Telephonic notice of certain incidents. At the earliest practicable moment following discovery, each operator shall give notice in accordance with paragraph (b) of this section of each incident.**

This office does not believe that the telephonic notice, made over 11 hours after the discovery of this incident, was made at the earliest practicable moment.

An advisory bulletin, dated April 15, 1991 (enclosed), from the Associate Administrator for Pipeline Safety was sent to all pipeline operators, re-emphasizing that telephonic notices can and should be made within one to two hours after discovery.

Because of the good faith that you have exhibited up to this time, we expect that you will act to ensure that the problem discussed in this letter will be addressed. Please refer to CPF No. 420001001 in any correspondence on this matter. If you have any questions or concerns please do not hesitate to contact me at (713)718-3746.

Sincerely,

R.M. Seeley, Director
Southwest Region

Enclosures