



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

Southwest Region,
Pipeline Safety

2320 LaBranch
Houston, TX 77004
(713) 718-3746

LETTER OF CONCERN

December 18, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Terry McGill, President
Columbia Gulf Transmission Company
2603 Augusta
Houston, Texas 77001-0683

CPF No. 46110-C

Dear Mr. McGill:

During the months of April and May 1996, a representative of the Southwest Region, Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code, conducted a pipeline safety inspection of Columbia Gulf Transmission Company on-shore facilities in Delhi, Rayne, Houma and Pecan Island, Louisiana.

As part of Southwest Region's goals we strive to conduct an effective, efficient and meaningful inspection. With the help of your staff we believe we met our goals and hopefully reduced Columbia's time burden by scheduling consecutively most of your onshore units within the Southwest Region.

Records were reviewed and field inspections were conducted at all listed unit locations. During the record review of the Houma and Pecan Island Units, we noted one situation where an alternative action may have been preferred.

A review of your "Safety Valve or Automatic Shut Off Device" inspection records for your **Houma** and **Pecan Island** locations indicated a delay in compliance with CFR 192.743 (b).

CFR 192.743 (b) states:

If a test is not feasible, review and calculation of the required capacity of the relieving device at each station *must be made at intervals not exceeding 15 months, but at least once each calendar year*, and these required capacities compared with the rated or experimentally determined relieving capacity of the device for the operating conditions under which it works. After the initial calculations, subsequent calculations are not required if the review documents that parameters have not changed in a manner which would cause the capacity to be less than required.

The calculation reviews were adequate. However, the reviews were not conducted within the time restriction imposed by the regulation. The code requires at least one review **per calendar year**. Capacity reviews for the **Houma** and **Pecan Island** sections were not done in calendar year 1995 because of a possible scheduling conflict between field and division personnel. Mechanical inspections were done late in the year and then were forwarded to the Division office for capacity reviews with limited time remaining in the calendar year. The conflict occurred when the days remaining in the calendar year were exceeded by the days Division personnel were scheduled away from the office. The problem was discussed and tentatively resolved by Section Superintendents scheduling mechanical inspections earlier in the year allowing Division personnel more time, but limited to 15 months from prior inspections, to address the reviews.

I hope you will consider this area of concern and strive to improve on the action in the future. If we can answer any questions or be of any assistance, please call us at (713) 718-3748. Thank you for your staff's cooperation and assistance during this inspection.

Sincerely,

James C. Thomas
Director