

LETTER OF CONCERN

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. D. A. Justin, Vice President
Manager of Western Area
Sun Pipe Line Company
907 South Detroit
P. O. Box 2039
Tulsa, Oklahoma 74102

Dear Mr. Justin:

CPF No48522C

On July 13-14, 1998, representatives of the Central, Southern and Southwest Regions, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code conducted an inspection of Sun Pipe Line Company's Emergency and Control Manuals in Sun's offices in Tulsa, Oklahoma. This inspection was the final phase of the review of Sun's manuals of written procedures for conducting operations and maintenance activities and for emergency response. The first phase was performed at Sun's offices in Philadelphia, Pa. on March 16-20, 1998.

More specifically the following manuals were reviewed - Emergency Manuals for Longview, Sour Lake, Snyder, Oklahoma and Mid-Valley; and the Control Manuals for Longview, Sour Lake, the Oklahoma System (North and South), Mid-Valley and Maumee. The Control Manual for Snyder was not reviewed.

As a result of the inspection and in keeping with pipeline safety regulations, Title 49, Code of Federal Regulations, Part 195, we have noted some areas of concern.

1. Section 195.52 requires the telephonic reporting of any failure that meets one of certain criteria. Sun's Emergency Manuals are written, such that, all of the events listed will have to occur before a telephonic report is required. It is recommended that the word "any" be added to the listing of events/qualifications. It is also recommended that a reference to §195.50 be added to page 2 in Section 11 of the Emergency Manuals for all the operation units.

2. It is recommended that Sun revise the Snyder Emergency Manual and list those pipeline segments that are regulated by 49 CFR Part 195 and which require immediate response in the event of an emergency.
3. It is recommended that a reference to the Emergency, Health and Safety (HES) Manual, where details for analyzing pipeline accidents are included, be added to Section 15 of the Emergency Manuals. This may ensure that accidents are analyzed properly.
4. It is recommended that the Mid-Valley and Snyder Emergency Manuals include the names and phone numbers of public officials to be contacted in the event of an emergency on these pipelines.
5. It is recommended that relief valves be added to the list of equipment found in Section 6 of the Emergency Manuals. The listing includes equipment that is monitored to determine if the pipeline is in an abnormal operating condition. Relief valves are already included in Section 6 of the Emergency Manual for the Sour Lake District.
6. It is recommended that references to the control room in the Emergency Manual for the Snyder District be changed from Tulsa Control Room to Snyder Control Room.
7. It is recommended that a requirement to review training programs be included in Section 14 of the Emergency Manuals and in Section 1 of the Control Manuals. It is also recommended that the reviews be performed at intervals not exceeding 15 months but at least once each calendar year.
8. It is recommended that the acronym “MAOP” in Section 6 of the Sour Lake District Emergency Manual be replaced with “MOP”. Maximum Allowable Operating Pressure (MAOP) is not defined or used in 49 CFR Part 195.

Sun Pipe Line Company personnel assured us that these changes will be made and that Sun will update OPS when the changes are made.

You will not hear from us again with regard to this concern. Because of the good faith that you have exhibited up to this time, we expect that you will act to ensure that the changes to the Emergency and Control Manuals are made. Please refer to CPF No. 48522C in any correspondence/communication on this manner.

Sincerely,

R. M. Seeley
Regional Director, Southwest Region