

LETTER OF CONCERN

(REVISED)

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 8, 1997

Mr. O.H. Cunningham
Vice President, Operations
TEPPCO
P.O. Box 2521
Houston, TX 77252 - 2521

CPF No. 26508C

Dear Mr. Cunningham,

On June 11-13, 1996, representatives of the Southern, Eastern, and Southwest Regions, Office of Pipeline Safety (OPS), met with TEPPCO's representatives at TEPPCO's Houston Office and conducted a joint review of your Operation and Maintenance Manual and Procedures.

As a result of the inspection, it appears that your Operation and Maintenance Manual and your procedures, as required of Title 49, Codes of Federal Regulations, Part 195, were deficient in six areas. I understand that TEPPCO was very cooperative and expeditious in participating on the review team, and submitted draft changes to the team within three weeks of the team meeting.

Because of the good faith that you have exhibited in addressing and correcting the deficiencies, you will not hear from us again regarding this project.

I apologize for the time delay in bringing this project to closure. One of the issues that OPS is addressing is review of the shorted casing enforcement policy , which is reason for part of the delay. Mohammed Shoaib of our office is responsible for review of shorted casing enforcement, and is to submit recommendations to the OPS Regional Directors in late January.

Sincerely,

Frederick A. Joyner
Director, Southern Region
Office of Pipeline Safety

cc: Compliance Registry, OPS Headquarters
file:TEPPCO

JDR/lgd

Note to those who received a copy of the December 18, 1996 Letter of Concern CPF No. 26508C. This Letter replaces the December 18 letter, which did not adequately convey TEPPCO's participation in the joint review team and TEPPCO's expeditious follow up in addressing the deficiencies.

The following is a list of the deficient areas identified by the joint review team.

1. §195.402(c)(1) requires the operator to make certain records, maps, and operating history available as necessary for safe operation and maintenance. The manual/procedures did not address this requirement.
2. §195.402(d)(1)(v) requires that abnormal operating procedures address any personnel error which could cause a hazard to persons or property when operating design limits have been exceeded. The manual/procedures did not address the requirement to include personnel error.
3. §195.406(a)(4) requires component factory test pressures or prototype test pressures of certain individually installed components, to be such that the maximum operating pressure does not exceed eighty percent of the component factory test pressure or of the prototype test pressure. Although the manual/procedures require these components to be tested by the manufacturer, or manufactured under a quality control system that ensures the component is equal in strength to a prototype tested by the manufacturer, the test pressure level of the component factory test or prototype test was not addressed.
4. §195.416(e) requires that if the operator finds, on buried pipe, active external corrosion, general surface pitting, or corrosion that has caused a leak, that it shall investigate further to determine the extent of the corrosion. The manual/procedures did not address the requirement, under the stated conditions, for further investigation.
5. §195.424(b)(1) prevents operators from moving “. . . any pipeline containing highly volatile liquids where materials in the line section are joined by welding unless . . . movement when the pipeline does not contain highly volatile liquids is impractical . . .” The manual/procedures did not address the “unless . . . impractical” requirement.
6. §195.234 (d) requires that during construction, at least 10 percent of the girth welds made by each welder during each welding day be nondestructively tested over the entire circumference of the weld. The manual/procedures did not address the requirement of testing 10 percent of each welder’s daily girth welds.