

December 23, 1996

LETTER OF CONCERN

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**Mr. Jean Marc Texeira
Vice President
Granite State Gas Transmission
323 West Road
P.O. Box 508
Portsmouth, NH 03802-0508**

CPF No. 16108C

Dear Mr. Texeira:

From September 16-18, 1996, a representative of the Eastern Region, Office of Pipeline Safety, inspected your pipeline facilities and records in Portsmouth, New Hampshire.

It was noted that welders have been qualified in accordance to Section 3 of API 1104, for the shielded metal arc welding process (SMAW). However, no program has been in place to ensure that the requirements of § 192.229(c) are satisfied in order to maintain the welders' qualifications. Section 192.229(c) requires that a welder qualified under § 192.227(a), i.e. Section 3 of API 1104 or ASME Section IX, may not weld unless within the preceding 6 calendar months the welder has had one weld tested and found acceptable under Section 3 or 6 of API 1104.

This issue was thoroughly discussed with your representatives during the inspection. Mr. James Wilbur, Pipeline Supervisor, indicated that Granite State would immediately implement a program to ensure that the requirements of § 192.229(c) are satisfied. This prompt action demonstrates Granite State's commitment in complying with the pipeline safety regulations.

We will inquire as to the progress of the implemented program during our next visit. Should you have any questions regarding this issue, or other pipeline safety regulatory issues, please do not hesitate to call our office at the following number (202) 366-4580.

Sincerely,

**William H. Gute
Eastern Regional Director
Office of Pipeline Safety**

PGUSTILO/sj/DPS-24/366-0568/12/23/96

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cc: DPS-22.1, DPS-24, Paul, All Regions, Send copy to Rick Marini