

## LETTER OF CONCERN

### CERTIFIED MAIL-RETURN RECEIPT REQUESTED

January 15, 1998

Mr. William White  
Vice President-Operations  
Columbia Gas Transmission Company  
P.O. Box 1273  
1700 MacCorkle Ave., SE  
Charleston, WV 25325-1273

**CPF No. 18101C**

Dear Mr. White:

As a result of the November 18, 1997, rupture of Line KA (20-inch, 0.250 inch wall thickness, 1931 vintage pipe, MAOP 393 psig) in Mingo County, West Virginia, Columbia Gas Transmission voluntarily reduced the normal operating pressure of 280 psig to 50 psig and initiated a remedial action plan to locate any other areas on this bare steel pipeline where corrosion or other conditions may have weakened it. During the accident investigation coordination between Columbia, the West Virginia Public Service Commission ( WV-PSC) and the Office of Pipeline Safety (OPS) was timely and thorough.

As a result of further investigation by Columbia, the root cause of Line KA's failure was general thinning of uncoated pipe in a flowing creek. Columbia's remedial action plan included patrolling activity, revealing several other exposed locations over Line KA. On December 18, 1997, Columbia replaced the corroded section of Line KA-20, which failed on November 18, 1997, in Mingo County, West Virginia. In addition, two of the eight exposed areas (approximately 20 feet of pipe at each location) were replaced and remaining six locations were examined and found to be in satisfactory condition.

The OPS has several concerns about the integrity of Line KA-20. As indicated by Columbia Gas Transmission Company, a leak clamp was installed in September 1997, at the same location where failure eventually occurred on November 18, 1997. Columbia's Operations and Maintenance (O&M) procedures and the Federal pipeline safety regulations, Title 49, CFR, Part 192, § 192.459 and § 192.485, address corrosion and remediation. Columbia

needs to reevaluate it's procedures for the detection of wall thinning (metal loss) of pipe wall and the adequacy of repair procedures. Columbia also needs to reevaluate it's procedures for surveillance of pipeline subjected to stream bed exposure per requirements of § 192.613. According to a letter dated December 19, 1997, from Steven P. Burnley, Administrator, Pipeline Safety, your leak patrol procedures will be amended and pipeline repair procedures will be developed to provide additional guidance on when to use ultrasonic wall thickness measurement by April 1998.

We are also concerned about recent changes made to Columbia's Inspection/Leakage form. In 1996, this form was identified as "Leak and/of Inspection Form" while in 1997, it was identified as "Leak Report". There is no linkage to a "Inspection Report". Columbia's December 19, 1997, letter to WV-PSC indicated that pipe inspection was not performed. In this letter, Columbia indicated that this oversight will be corrected and a company-wide "Pipeline Repair Notification Bulletin" was issued. It is our understanding that the revisions to the Leakage/Inspection Report forms are expected to be completed by April 1998.

It is our understanding, that Columbia intends to occasionally operate line KA-20 at a higher pressure, 325 psig for a short time. We will be concerned if this mode of elevated pressure operation were to last extended periods of time. The 1931 vintage pipe Line KA-20 has history of leaks reported while operating at higher pressures. The OPS is also concerned that Columbia does not plan to replace this pipe until at least year 2000. We suggest that Columbia reevaluate the replacement priority of Line KA-20.

We also recommend that a greater emphasis be placed on adequate training of field personnel to assure that all pertinent data about pipeline inspections is properly documented and reviewed. Please make sure to send the revised procedures and forms to this office and the WV-PSC when completed. We appreciate your cooperation.

Sincerely,

William H. Gute  
Eastern Regional Director  
Office of Pipeline Safety

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cc: DPS-24, DPS-22.1, NJDO, All Regions, WVPS-CMcKown, Dino, Atif, Phillip