

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 27, 1996

Mr. Mike Gregerson
Vice President of Division Operations
Northern States Power Company
100 N. Barstow
Eau Claire, WI 54703

CPF No. 36302M

Dear Mr. Gregerson:

On May 30-31, 1995, a representative of the Central Region, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code, conducted a standard inspection and a field drug and alcohol inspection of Northern States Power Company's (NSP's) LNG plant located at Eau Claire, Wisconsin.

As a result of the inspection, it appears that you have committed a probable violation, as noted below, of pipeline safety regulations.

1. § 193.2635 Monitoring corrosion control.

§ 193.2635(a) requires that each buried or submerged component under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months, to determine whether the cathodic protection meets the requirements of § 192.463.

During the inspection it was noted that NSP was monitoring the cathodic protection of its buried pipeline by using a permanently installed monitoring system consisting of a Simpson digital meter where one terminal is connected to the underground piping through a switch and the other terminal of the meter is connected to the station ground. The meter reads the difference in potential between the two terminals. Ideally a reading on the meter of 500 mV or greater assumes that the cathodic protection is meeting the 850 mV criteria. This assumes that the structure-to-soil potential is at least 350 mV.

NSP's cathodic protection procedures referenced the -850 mV cathodic protection criteria relative to a copper-copper sulphate half cell. During the inspection, NSP was able to produce documentation showing that NSP had taken pipe-to-soil readings with a meter and a copper-copper sulphate half cell in addition to recording weekly readings via the Simpson

meter.

Following the 1995 inspection, NSP voluntarily submitted revised cathodic protection procedures under § 193.2635. However, in submitting the revised procedures, NSP omitted reference to using a meter and a copper-copper sulphate half-cell to measure pipe-to-soil readings to determine if the -850 mV was being met. Instead, NSP revised its procedures to address using the Simpson meter method while assuming that the structure-to-soil potential is a constant 350 mV. NSP did not address how the 350 mV, structure-to-soil potential is measured or determined.

NSP is required to demonstrate that the actual structure-to-soil measurement is a consistent 350 mV each time a pipe-to-soil reading is recorded.

When it is found that an operator's procedures are inadequate, 49 C.F.R. § 190.237 provides that the operator, after notice and opportunity for hearing may be required to amend its plans and procedures. This letter serves to provide you with notice of the inadequate procedure and the response options as prescribed under § 190.237. The operator is allowed thirty (30) days after receipt of such notice to submit written comments or request a hearing. After considering the material presented, the Office of Pipeline Safety is required to notify the operator of the required amendment or withdraw the notice proposing the amendment. If you do not desire to contest the notice, please provide the revised procedures within thirty (30) days of receipt of this notice.

Sincerely,

Ivan A. Huntoon
Director, Central Region
Office of Pipeline Safety