

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 6, 1998

Mr. C. E. Doubrava
Vice President of Transmission
Natural Gas Pipeline Company of America
701 East 22nd Street
Lombard, IL 60148

CPF No. 38112M

Dear Mr. Doubrava:

On May 21, 1997, we were notified of an incident involving the inadvertent valve closing and pressure loss at the take station for Northern Illinois Gas (NIGas) in Grundy County, IL. Apparently, a mainline valve was left closed during an annual inspection, and then re-opened about three (3) hours later without any notification to NIGas.

As a result of the inspection, it appears that you have committed a probable violation, as noted below, of the pipeline safety regulations, Title 49, Code of Federal Regulations, Part 192. The item inspected and the probable violation is:

1. **§ 192.605(c)(1)(i)-(v) - Procedural manual for operations, maintenance, and emergencies - Abnormal operations**

For transmission lines, the manual required by paragraph (a) of this section must include procedures for the following to provide safety when operating design limits have been exceeded:

- 1) **Responding to, investigating, and correcting the cause of:**
 - i) **Unintended closure of valves or shutdowns;**
 - ii) **Increase or decrease in pressure or flow rate**

- outside normal operating limits;
- iii) Loss of communication;
- iv) Operation of any safety devices; and
- v) Any other foreseeable malfunction of a component, deviation from normal operation, or personnel error, which may result in hazards to persons or property.

Natural Gas Pipeline Company of America's (NGPL) O&M procedures did not adequately address these five (5) specific requirements. As was indicated earlier, the NGPL field technician found the abnormal operating condition and opened the valve without any notification to NIGas or his superiors.

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 procedures 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