NOTICE OF AMENDMENT

CERTIFIED - RETURN RECEIPT REQUESTED

August 26, 1999

Mr. Gary Walker
Vice President - Operations & Technical Services
Pacific Gas Transmission Company
2100 SW River Parkway
Portland, OR 97201

CPF No. 57101-M

Dear Mr. Walker:

On June 24-28, 1996, a representative of the Western Region, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code, conducted an onsite pipeline safety inspection of Pacific Gas Transmission Company's (PGT) Idaho facilities in Spokane, WA.

As a result, from the review of your operating and maintenance manual, the requirements for which are set forth in Section 49 CFR §192.605, the following inadequate procedures were noted:

1. **§192.605 Each operator shall include the following in its operating and maintenance plan:**
   (b) Maintenance and normal operations. The manual required by paragraph(a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations;
   (1)Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.

   (a)§192.619 Maximum allowable operating pressure: Steel or plastic pipelines.

   At the time of the inspection, PGT's general procedures were inadequate in that they did not include specific detailed procedures addressing the requirements of §192.619.

(b)§ 192.706 Transmission lines: Leakage surveys.

(a) Each operator of a transmission line shall provide for periodic leakage surveys of the line in its operating and maintenance plan.

At the time of the inspection, PGT's general leak survey procedures were inadequate in that they did not include specific detail procedures for each type of leak detection equipment employed. The procedure did not distinguish between the use of a Flame Ionization or a Combustible Gas indicator. An adequate procedure would be detailed enough to indicate the limitations concerning each piece of equipment, e.g., a flame ionization unit may only be utilized when wind velocity is calm to a few miles per hour, bar hole information, etc. (the exact limitations should be obtained from the manufacturer specifications).

(c)§192.463 (a) External corrosion control: Cathodic protection (a) Each cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in Appendix D of this part. If none of these criteria is applicable, the cathodic protection system must provide a level of cathodic protection at least equal to that provided by compliance with one or more of these criteria.

At the time of the inspection, PGT's corrosion control procedures or annual corrosion surveys revealed that their CP monitoring tests do not consider voltage (IR) drop in their assessment of cathodic protection. Appendix D, paragraph II asserts that IR drop be considered when measuring the adequacy of CP. PGT must develop test procedures that consider, to the maximum practicable extent, voltage drops, other than those across the structure-electrolyte boundary, to determine the true polarized potential of the pipeline.

As provided in 49 C.F.R. §190.237, this Notice of Amendment serves as your notification that this office considers your procedures/plans inadequate. Under 49 C.F.R. §190.237, you have a right to submit written comments or request an informal hearing. You must submit written comments or a request for a hearing within 30 days after receipt of this Notice. If you do not wish to contest this Notice of Amendment, you may provide your revised procedures within 30 days of receipt of this notice. After reviewing the record, the Associate Administrator for Pipeline Safety will determine whether your plans or procedures are adequate. The criteria used in making this determination are outlined in 49 C.F.R. §190.237.

Please refer to **CPF No. 57101-M** in any correspondence/communication on this matter.

Sincerely,

Edward J. Ondak
Director

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