

Ryan Truair
Senior Manager, Code Compliance

July 1, 2024

Mr. Scott Rukke
Pipeline Safety Director
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
P. O. Box 47250
Olympia, Washington 98504-7250

Re: NW Natural Response to Clark County Resource Center Inspection, Report No. 8800

Dear Mr. Rukke:

The Washington Utilities and Transportation Commission (WUTC) Staff conducted a Natural Gas Standard Comprehensive inspection for the Clark County Resource Center on April 15 - 18, 2024. This letter is the response to the findings of Inspection Report 8800, sent on May 29, 2024.

1. Probable Violation:

WAC 480-93-110 Corrosion Control

(8) On all cathodically protected pipelines, the gas pipeline company must take a cathodic protection test reading each time an employee or representative of the gas pipeline company exposes the facility and the protective coating is removed.

Findings:

After reviewing NWN Completed Pipe Inspection Reports for 2021-2023, several issues were noted and it was unclear if NWN took a pipe-to-soil read when the pipe was exposed as the reports were either not completed consistently or completely:

- *Several of the reports indicated coating was not removed but a pipe-to-soil read was noted;*
- *Several of the reports did not indicate if the coating was removed but a pipe-to-soil read was not taken;*
- *Several of the reports had a positive pipe to soil read (should be negative polarity);*

- *Per the report, there were approximately 8 jobs in 2023 where a pipe-to-soil was not taken. NWN procedure SPW 459, "Inspection of Exposed Pipe and Internal Pipe Surfaces," section 2.2 covers this.*

NW Natural Response:

NW Natural (NWN) will be adding data validation checks to the work order completion process that will require entry of pipe-to-soil reads for exposed steel pipe when the protective coating is removed. Additionally, data validation rules will be implemented to ensure the correct polarity is documented when pipe to soil reads are taken. These enhancements are expected to be implemented by January 1, 2025. NWN will provide a follow up as soon as this is accomplished.

2. Probable Violation:**WAC 480-93-115 Casing of Line Pipes**

(3) Whenever a gas pipeline company installs a main or transmission line in a casing or conduit of any type material, the gas pipeline company must seal the casing ends to prevent or slow the migration of gas in the event of a leak.

(4) Whenever a gas pipeline company installs a service line in a casing or conduit, the gas pipeline company must seal the casing at the end nearest the building wall to slow the migration of gas towards the building in the event of a leak.

Findings:

While reviewing construction records for newly installed services and mains, NWN could not provide evidence if the installed pipe was or was not installed in a casing/conduit, and if it was, whether the end(s) were sealed. NWN has procedures that require ends to be sealed as stated in the FOM "Guidelines for Installing Conduit", "Installing Steel Pipe in Casing", and "Installing Polyethylene Pipe Through Conduits or Casing". It is also reviewed by NWN's Quality Assurance Inspections in element B2f "Proper sealing of casing/conduit". Although their procedures require it, NWN provided no documentation showing if a newly installed pipe was cased and sealed.

NW Natural Response:

NWN recognizes the concern regarding providing records for sealed casing procedures. Current field operations practices require construction crews to as-built and document total footage of casing/conduit utilized when installing services and mains. These casings/conduits are sealed as prescribed in NWN SPW-160 and the Field Operations Manual, but are not explicitly documented in as-builts or workorders. NWN will modify procedures to document the sealing of casings/conduits. These changes require alterations to existing work order field completions for services within NWN's Clevest software, and engineering sketches for mains to document when casing/conduits are sealed. This is expected to be implemented by January 1, 2025. NWN will provide a follow up as soon as this is accomplished.

This report finalizes NWN's response to the Clark County Inspection, Report No. 8800.

Sincerely,



Ryan Truair
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