

MEMORANDUM

TO: Commissioner's, Tony Clark, Brian P. Kalk and Kevin Cramer
FROM: Bob Bachmeier, Gas Pipeline Safety Inspector
DATE: October 28, 2011
RE Staff Review of Granville's response to the Commission's May 5, 2011 Order in Case No. GS-10-602

The Commission's May 5, 2011 Order determined that Granville violated several gas pipeline safety regulations. The Order required responses from Granville by June 6, 2011 regarding most of the violations. Subsequently, the Commission extended the response date to July 12, 2011. Granville provided responses on June 3 and June 7, 2011. The response date for Order clause 8 is May 7, 2012.

Order clause 2

The City of Granville shall, by June 6, 2011, provide to the Commission a pressure test report to show the actual amount of pressure applied and test duration to the service line repaired on July 15, 2010.

Staff review: Granville did provide the pressure test report.

Order clause 3

The City of Granville shall, by June 6, 2011, provide to the Commission written proof that it has qualified the plastic joining procedure in Granville's Operation and Maintenance Plan that was used to repair the service line on July 15, 2010.

Staff review: Granville did provide written proof it has qualified the plastic joining procedure.

Order clause 4

The City of Granville shall, by June 6, 2011, provide to the Commission a written emergency training plan that will insure that in the future all emergencies will be responded to in accordance with Granville's Emergency Response Plan and 49 CFR Part 192.

Staff review: Granville did provide a written emergency training plan that will insure that, in the future, all emergencies will be responded to in accordance with Granville's Emergency Response Plan and 49 CFR Part 192.

Order clause 5

The City of Granville shall, by June 6, 2011, provide to the Commission a written report that shows a review of Granville employee activities during this emergency and a determination as to whether Granville's procedures were effectively followed.

Staff review: Granville did provide a written report that shows a review of Granville employee activities during the emergency and a determination as to whether Granville's procedures were effectively followed.

Order clause 6

The City of Granville shall, by June 6, 2011, provide to the Commission, in writing, a written qualification program that includes all elements listed under 49 CFR 192.805 including all of Granville's covered tasks, the name(s) of individuals who perform those tasks, and when and how those individuals were qualified to perform those tasks. If Granville's staff has not been qualified to perform certain tasks, then the City of Granville shall show how and when training will occur. The City of Granville shall provide to the Commission operator qualification records for any individuals or contractors who will perform covered tasks in the interim until Granville staff has been qualified.

Staff review: 1) Granville did provide a written qualification program that includes all elements under 49 CFR 192.805 including all of Granville's covered tasks, the names of individuals who perform those tasks. 2) Granville did not provide information showing how those individuals were qualified to perform covered tasks. 3) Granville did not provide information stating how and when training will occur if Granville's staff has not been qualified to perform covered tasks, and 4) Granville did not provide operator qualification records for any individuals or contractors who will perform covered tasks in the interim until Granville staff has been qualified.