



ILLINOIS COMMERCE COMMISSION

October 2, 2013

Mr. Ron Pate, Vice President
Operations and Technical Services
Ameren Illinois
370 S. Main
Decatur, Illinois 62523

Re: Notice of Amendments (NOA #'s 2013-A001-00207, 2013-A001-00208, 2013-A001-00209, 2013-A001-00210, 2013-A002-00210, 2013-A001-00211, 2013-A002-00211, 2013-A001-00212, 2013-A002-00212, 2013-A001-00213, and 2013-A001-00214)

Dear Mr. Pate:

Representatives of the Illinois Commerce Commission Pipeline Safety Program ("Staff") conducted a review of the Operation and Maintenance ("O&M") Manual revisions submitted to Staff in April, 2013.

As a result of the audit, it appears that Ameren Illinois ("Ameren") revisions to the O&M appear to be inadequate or require clerical revisions.

Below is a listing of the section of the Code of Federal Regulations (underlined) applicable to the deficiencies noted during the O&M review. Located immediately after each underlined citation is the appropriate section in the Code of Federal Regulations detailing the requirement as well as a brief explanation of the deficiency discovered during the audit.

§192.13 What general requirements apply to pipelines regulated under this part?

- (c) *Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.*

Listed below are the two instances detailing the failure to meet the requirements as stipulated under 192.13 (c).

§192.353 Customer meters and regulators: Protection from damage. (NOA #2013-A001-00212)

- (a) ***Each meter and service regulator, whether inside or outside a building, must be installed in a readily accessible location and be protected from corrosion and other damage, including, if installed outside a building, vehicular damage***

that may be anticipated. However, the upstream regulator in a series may be buried.

Review of revisions submitted for METER sections 3.21-3.26 do not include the provision for installing protector posts in the material lists if the meter set is prone to vehicular traffic or other types of damage. There is a requirement in METER 1 in 3 F (3) that requires the installation of guard posts or railings to protect from damage where exposed to vehicular traffic or other outside forces. Staff requests that the materials allowed to be used for protection shall be defined or referenced in each of the applicable metering sections. If these are a case by case design, a statement requiring the installer to contact engineering to design the required barrier to provide ample protection for the meter set against damage should be included.

§192.327 Cover. (NOA #2013-A002-00212)

- (c) *Where an underground structure prevents the installation of a transmission line or main with the minimum cover, the transmission line or main may be installed with less cover if it is provided with additional protection to withstand anticipated external loads.*

Review of MAIN 1, indicates that when main is installed with less than the required amount of cover, a warning barrier tape is utilized as a warning method to future excavators. Staff does not agree that this sole measure is sufficient to protect the piping. Warning barrier tape cannot withstand external loading and is not an effective stand alone damage prevention measure. Shallow installation locations should also be noted on company mapping utilized by locating and company personnel. Such a precaution will allow the locator to warn excavators of the shallow condition. Depending on the location of the shallow pipe additional measures may be required to prevent undue strains being exerted on the pipe. The procedure shall include a process to initiate an engineering review to ensure the pipe is adequately protected against strains and subsequent damage. This section needs further revisions or if protection of shallow facilities is covered elsewhere in the O&M, a reference needs to be added here.

§192.605 Procedural manual for operations, maintenance, and emergencies

- (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.***
- (2) ***Controlling corrosion in accordance with the operations and maintenance requirements of Subpart I of this part.***

Listed below are two the instances detailing the failure to meet the requirements as stipulated under 192.605 (b) (2).

§192.459 External corrosion control: Examination of buried pipeline when exposed. (NOA # 2013-A002-00210)

Whenever an operator has knowledge that any portion of a buried pipeline is exposed, the exposed portion must be examined for evidence of external corrosion if the pipe is bare, or if the coating is deteriorated. If external corrosion requiring remedial action under Secs. 192.483 through 192.489 is found, the operator shall investigate circumferentially and longitudinally beyond the exposed portion (by

visual examination, indirect method, or both) to determine whether additional corrosion requiring remedial action exists in the vicinity of the exposed portion.

Staff has concerns with the revision to CORR 2.30 which does not require completion of a pipe inspection form on piping that is being abandoned. The information gathered may provide pertinent information on connected piping that is not being abandoned or is of the same vintage and coating type that is located in other parts of their system. Staff requests that this information be retained when piping is exposed during the abandonment to aid in detecting issues with similar piping, materials or coatings.

§192.467 External corrosion control: Electrical isolation. (NOA #2013-A001-00210)

- (c) *Except for unprotected copper inserted in a ferrous pipe, each pipeline must be electrically isolated from metallic casings that are a part of the underground system. However, if isolation is not achieved because it is impractical, other measures must be taken to minimize corrosion of the pipeline inside the casing.*

Review of the casing inspection procedures in item (3) of CORR 2.19 defined below, established the requirement for the "type" of further testing to be performed is not defined in the "Note" section.

- (3) Casings with less than 25 mV difference between the pipe-to-soil readings shall have an additional test for isolation performed and be reported to the Gas Supervisor for further analysis, unless the casing is filled.

Note: If the half cell has to be moved to perform both potential tests, casings with less than 200 mV difference between the pipe-to-soil and casing-to-soil readings shall have at least one additional test performed and be reported to the Corrosion Supervisor for additional analysis

Staff requests the operator to include "test for isolation" in the notes section as it is defined in number (3) of this section.

§192.605 Procedural manual for operations, maintenance, and emergencies

- (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.*

Listed below are two instances detailing the failure to meet the requirements as stipulated under 192.605 (b)

§192.725 Test requirements for reinstating service lines. (NOA #2013-A001-00211)

- (b) *Each service line temporarily disconnected from the main must be tested from the point of disconnection to the service line valve in the same manner as a new service line, before reconnecting. However, if provisions are made to maintain continuous service, such as by installation of a bypass, any part of the original service line used to maintain continuous service need not be tested.*

Review of revisions to 2. C. (3) (d) in LEAK 2.05 indicate a pressure test is required on a segment of piping being reinstated or replaced. This section further indicates a test is not required on a segment of main or service piping that is being abandoned. Staff has no issue with the abandoned section but cannot determine from the procedure where the cap, plug or fitting used to isolate the live facility is leak tested using leak detection solution. This section does not include the documentation of this test or indicate how or where it will be documented. Staff determined the records are required to be documented in item 5 of the abandonment section of ABND 2.01. Staff requests that Ameren reference the document to be used or define where and how this leak test shall be conducted, recorded and retained.

§192.725 Test requirements for reinstating service lines. (NOA #2013-A002-00211)

- (b) Each service line temporarily disconnected from the main must be tested from the point of disconnection to the service line valve in the same manner as a new service line, before reconnecting. However, if provisions are made to maintain continuous service, such as by installation of a bypass, any part of the original service line used to maintain continuous service need not be tested.*

Review of LEAK 2.05 dealing with abandonment of facilities states no pressure test is required if piping is being permanently disconnected. If a service or main is abandoned, the cap or isolation point on the live facility shall be tested to ensure no leakage is present. How/where will the leak test be recorded, if not recorded here, to document the leak test on the isolation point for the abandonment? Staff requests either a reference be added or indicate where the leak test is to be documented.

§192.615 Emergency plans. (NOA #2013-A001-00213)

- (a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:*
 - (1) Receiving, identifying, and classifying notices of events which require immediate response by the operator.*

Review of Gas Leak Field Case reports revision log submitted determined the indicated revision to item 2. A. (12) which was the addition of Job Order # does not appear to have been added. DOJM Order is still indicated rather than Job Order #. Staff requests Ameren to review and determine is the correct reference.

§192.615 Emergency plans. (NOA #2013-A001-00214)

- (a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:*
 - (3) Prompt and effective response to a notice of each type of emergency, including the following:*
 - (i) Gas detected inside or near a building.*

Item 2 D. (5) of LEAK 2.05, allows the use of an FI or CGI with bar holes to be utilized as the verification method during a recheck to verify if below ground gas exists. Item D of the Leak Recheck in the Gas Leak Case Field report form only allows a CGI to be used for verification of a below ground leak. It is unclear as to whether a FI unit can be used to determine if a below ground leak exists when performing a leak recheck.

§192.615 Emergency plans. (NOA #2013-A001-00209)

- (a) *Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:*
 - (3) *Prompt and effective response to a notice of each type of emergency, including the following:*
 - (iii) *Explosion occurring near or directly involving a pipeline facility.*

Review of the revisions to INVE 2.20 detected an issue with a hot link in the current version of the O&M 5.1. The link indicates to review INCD 1 but this link takes the user to INVE 1. Staff requests that the hot link be reviewed and corrected.

§192.615 Emergency plans. (NOA #2013-A001-00207)

- (b) *Each operator shall:*
 - (1) *Furnish its supervisors who are responsible for emergency action a copy of that portion of the latest edition of the emergency procedures established under paragraph (a) of this section as necessary for compliance with those procedures.*

Staff's review of the forms referenced in INVE 4, utilized to document incident findings and maintain chain of custody do not have form numbers or the date of the current edition. Staff suggests assigning form numbers to allow employees to ensure they are using the correct form and give it a date to ensure the current edition is being used.

§192.614 Damage prevention program. (NOA #2013-A001-00208)

- (a) *Except for pipelines listed in paragraphs (d) and (e) of this section, each operator of a buried pipeline shall carry out in accordance with this section a written program to prevent damage to that pipeline by excavation activities. For the purpose of this section, "excavation activities" include excavation, blasting, boring, tunneling, backfilling, the removal of above ground structures by either explosive or mechanical means, and other earth moving operations. An operator may perform any of the duties required by paragraph (b) of this section through participation in a public service program, such as a "one-call" system, but such participation does not relieve the operator of responsibility for compliance with this section.*

Staff identified during what appeared to be failure to place a period at the end of the sentence in # 3 of BORE 2.05. Staff requests the operator to review and make the necessary revisions to this section.

This letter serves as notice of inadequate procedures. A response to this notice is requested by November 4, 2013. If you are contesting this Notice, include a detailed written explanation and any necessary supporting documents with your response.

If you are not contesting this Notice, the response must acknowledge that amended procedures will be provided to this office by January 4, 2014. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

Failure to respond to this Notice and take corrective action will result in the issuance of a Notice of Probable Violation and initiation of a Citation Order that will subject Ameren Illinois to a penalty assessment as allowed under Section 7 of the Illinois Gas Pipeline Safety Act (220 ILCS 20/7).

Please be advised that pursuant to IL Adm. Code Part 596 of the Commission's Rules, all information regarding this inspection in possession of the Commission, including communications regarding this inspection will be made available to the public and posted on the Commission's website. Confidential and/or personal information including, but not limited to social security numbers, drivers license numbers, credit card numbers, debit card numbers, and medical records, etc. should be included in neither inspection documents nor correspondence with the Commission. Any person, as set forth in Section 596.20, who believes that any inspection information is confidential or proprietary shall request that the Commission enter an order to protect the confidential or proprietary information pursuant to 83 Ill. Adm. Code 200.430.

If you have any questions concerning this matter, please contact James Watts at (217) 414-9609, or I may be contacted at (217) 785-1165.

Sincerely,



Darin Burk
Pipeline Safety Program Manager

DRB/ns