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MAY 31 2014

Illinois Commerce Commission
GAS PIPELINE SAFETY

May 31, 2014

SENT VIA EMAIL

Mr. Darin Burk
Manager, Gas Pipeline Safety
Illinois Commerce Commission
527 E. Capitol Avenue
Springfield, Illinois 62701

Dear Darin:

This letter is in response to the Notices of Probable Violation (NOPV 2014-V001-0030 and 0031) issued on May 8, 2014, following an ICC record audit (Inspection # 2014-P-00187) conducted on April 29, 30 and May 1, 2014 at the Ameren Illinois (AIC) Maryville Operating Center.

During the audit, Staff reviewed compliance records for the Maryville Operating Center including records for a distribution leak survey # 1391. This survey was coded as an unprotected leak survey in the AIC Gas Compliance System (GCS). The survey had previously contained a gas main segment of 8 inch bare steel that was cathodically unprotected. While this segment had been retired in February 2010 after a segment of 4 inch plastic was installed in December 2009, the leak survey type was not updated to a cathodically protected leak survey type in GCS. Staff issued an NOPV (2014-V001-00031), noting this discrepancy, and requesting that documentation be provided to Staff by August 1, 2014 that maps and records related to unprotected bare steel have been updated.

The survey type for leak survey # 1391 was updated in the AIC GCS system on May 27, 2014 to indicate that the facilities are cathodically protected. The 8 inch bare steel main segment was confirmed to have been retired from the mapping system in March 2010. Documentation of the updated leak survey and of the location where the 8 inch steel main was retired is attached. During the timeframe that this leak survey was coded as Unprotected, the survey was scheduled to be conducted on a three year cycle instead of the four year cycle associated with cathodically protected facilities.

To prevent a reoccurrence of this situation, a review of all leak surveys that are coded as Unprotected in the AIC GCS system will be conducted. A summary of this review, including any additional deficiencies noted and corrected will be communicated to Staff by August 1, 2014.

During a review of documentation for completed leak surveys, Staff noted that a 2 inch steel main segment along Bissell Avenue in Madison, IL was not leak surveyed as required in 2013 on business district leak survey # 271. Staff issued an NOPV (2014-V001-00030) with regard to the segment that was not surveyed, and requested that AIC provide documentation by August 1, 2014 that the segment has been leak surveyed.

Upon discovery, AIC conducted a leak survey of this 2 inch steel main segment and two associated services on April 30, 2014. No leaks were discovered during this survey. Documentation of this follow-up survey is attached. AIC determined that the leak survey maps that were printed for the 2013 survey did not contain the gas main segment along Bissell Avenue. The printed maps for this survey were produced at a different scale in 2013 and inadvertently did not include this particular main segment. To prevent a reoccurrence of this situation, AIC is conducting a quality assurance review to confirm that printed business district survey maps for 2014 surveys include all required main segments to be surveyed. In addition, AIC is preparing for the implementation of a mobile gas compliance work management system which will include an electronic leak survey tracking process that will not rely on printed leak survey maps. This system is scheduled to be implemented in the fourth quarter of 2014.

Please feel free to contact me if you have any concerns or if you would like any additional information regarding these issues.

Sincerely,



John W. Bozarth
Manager, Gas Compliance & Training

cc: RDPate
JPBarud
GMReed
SAGlaeser
SRColyer
JKVoiles

Attachments

Nelson, Michelle

From: Bozarth, John W <JBozarth@ameren.com>
Sent: Saturday, May 31, 2014 10:43 AM
To: Nelson, Michelle
Cc: Fuller, Michael G
Subject: Ameren Illinois NOPV Response - NOPV 2014-V001-00030 and -00031
Attachments: AIC NOPV Response 2014-V001-030 and 031 05-31-2014.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Michelle,

Please find attached a response letter for NOPV # 2014-V001-00030 and -00031.
This was related to Inspection # 2014-P-00187.

This email is requesting a delivery receipt.

Thank You for your assistance,

JOHN W. BOZARTH :: Manager, Gas Compliance & Training :: T 217.625.6854 :: C 217.257.6276
Ameren Illinois :: 2125 E. State Rt 104 :: Pawnee, IL 62558

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