

Ref. No. Docket PG-040560

CERTIFIED MAIL

June 14, 2004

Will Odell
Chief Operating Officer
Cascade Natural Gas Corp.
222 Fairview Avenue North
Seattle, Washington 98109

Dear Mr. Odell:

Subject: 2004 Operator Qualification Inspection

During the week of April 12 - 15, 2004, Pipeline Safety Staff (Staff) representing the Washington Utilities and Transportation Commission conducted an inspection of Cascade Natural Gas Corporation's (CNG) Operator Qualification Program (OQ).

The review of CNG's OQ Plan, practices and documentation identified four violations of CFR 49, Part 192 Subpart N. Enclosed with this letter is our report that summarizes the results of the inspection.

Please respond to this letter by July 16, 2004, indicating how each area of violations will be corrected. Please refer to Docket PG-040560 in any correspondence regarding this inspection.

Cascade Natural Gas Corp.

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Commission staff appreciates Jeff Staudenmeier and Keith Meissner cooperation and professional manner throughout the inspection. Please contact Patti Johnson at (360) 664-1266 or (360) 870-4915 for technical assistance or questions.

Sincerely,

Alan E. Rathbun
Pipeline Safety Director

Enclosure

cc: Keith Meissner, CNG

The Washington Utilities and Transportation Commission (Commission) has the authority to enforce the minimum safety regulations per Chapter 480-93 of the Washington Administrative Code (WAC) pertaining to the construction, maintenance and operation of pipelines transporting natural gas in the state of Washington. In addition, the Commission adopts the Code of Federal Regulations (CFR) Title 49, Part 191 and 192.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
2004 Operator Qualification Inspection Report
Cascade Natural Gas Corporation
Docket PG-040560

VIOLATIONS

1. **192.805 (b) Qualification Program.**

Each operator shall have and follow a written qualification program. The program shall include provisions to:

- (b) *Ensure through evaluation that individuals performing covered tasks are qualified;*

Finding:

At the time of the inspection, CNG's written qualification program did not include provisions to ensure through evaluation that individuals performing covered tasks are qualified to recognize and react to abnormal operation conditions (AOCs). CNG's evaluation method(s) did not include AOCs.

2. **192.807 (a) Record Keeping.**

Each operator shall maintain records that demonstrate compliance with this subpart.

- (a) *Qualification records shall include:*
- (1) *Identification of qualified individual(s);*
 - (2) *Identification of the covered tasks the individual is qualified to perform;*
 - (3) *Date(s) of current qualification; and*
 - (4) *Qualification method(s).*

Finding:

At the time of the inspection, CNG's records did not include evaluation methods and documentation for AOC's.

3. **192.809 (b) General.**

- (b) *Operators must complete the qualification of individuals performing covered tasks by October 28, 2002.*

Finding:

At the time of the inspection, CNG did not complete the qualification of individuals performing covered tasks by October 28, 2002. CNG did not include AOC's in the evaluation process.

4. **192.805 (f) Qualification Program.**

Each operator shall have and follow a written qualification program. The program shall include provisions to:

- (f) Communicate changes that affect covered tasks to individuals performing those covered tasks; and*

Finding:

At the time of the inspection, CNG's OQ Plan Section .073 delegates this responsibility to Safety & Engineering. CNG's written qualification program did not reference or include written procedures to communicate and document communicated changes.