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Title: Establishing Alternate Means of Control (AMC) for Inoperable Valves

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The purpose of this bulletin is to provide clarity on administrative expectations concerning the restoration of inoperable emergency valves.

This document supports WP4430-04, "Gas Valve Maintenance Requirements and Procedures".

This bulletin will be incorporated in the next revision of WP4430-04. Upon incorporation with the procedure, this bulletin will be canceled.

Gas Superintendents and Supervisors who are responsible for implementing WP4430-04 are responsible for implementing the requirements of this bulletin. Planning and execution of alternate procedures shall include consultation with the appropriate Senior Gas Engineer and Gas Planner.

This bulletin applies to all gas transmission and distribution emergency valves.

Definitions:

Emergency valve – Any transmission line valve that might be required during any emergency or a valve in a distribution system that is necessary for the safe operation of the system.

Emergency Shutdown Zone Procedures – Procedures for the safe emergency shutdown of distribution zones. These procedures are developed for the gas system with all emergency valves available for operation.

Inoperable valve — 1) A valve whose internal plug, ball, gate or disk will not move when the maximum torque specified in WP 4430-04 Attachment 4 and 5 is applied to the valve stem. 2) Valve that can not be accessed due to traffic conditions, pavement overlay, flooding or other reasons limiting the access and operation of the valve.

Prompt Repair (also "promptly repaired" adj) – A repair and maintenance that is completed before the compliance date is exceeded. For annual maintenance this is once each calendar year not to exceed 15 months from the date of last maintenance.

Page 1

Material Redacted GTR0007758

Bulletin Number: TD-4430B-001 Date: 08/26/10

Alternate Means of Control (AMC) Procedure – A written procedure for the safe shutdown of the gas system when an emergency valve is found to be inoperable. The AMC is to be used in conjunction with the emergency shutdown plan for a segment or zone in an emergency. (See Attachment 1 for an AMC Form)

Procedure:

Upon discovery of an inoperable valve the following procedure applies.

- A. Complete AMC procedure for inoperable valves which are not promptly repaired (see Attachment 2 for an example of an AMC). The AMC scope is limited to the identification of additional valve or valves required to control the flow of gas through the inoperable emergency valve. For normally closed valves the scope is limited to valves required to provide a flow path around the inoperable valve.
 - a. Control points may be upstream or downstream of the inoperable valve provided line MAOPs are not exceeded.
 - b. Isolation of the inoperable valve is not required for the AMC.
 - c. Alternate means of control must designate valves only.
 - i. Squeezing is not permitted for the AMC.
 - ii. Verify that the designated valves being credited for alternate means of control are operable (i.e., have been maintained within the last 12 months).
 - d. Inoperable valves that are promptly repaired do not require a written AMC.
- B. The AMC procedure is to be filed with the valve maintenance card. Emergency response personnel must review the valve maintenance cards on file in an emergency.
- C. All emergency valves found inoperable must be restored to service within 12 months of the finding, or obtain written documentation that the valve is no longer needed. If the valve is not needed to safely shut down the zone, then the Emergency Shut Down Zone binders need to be updated within 12 months.
- D. Once operable the AMC can be discarded.

Page 2

Material Redacted GTR0007759

Approved by:

Date: 08/26/10

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Page 3

GTR0007760 Material Redacted