



THE COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC UTILITIES

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**NOTICE OF PROBABLE VIOLATION**  
**ELECTRONIC MAIL – RETURN RECEIPT REQUESTED**

July 29, 2020

D.P.U. 20-PL-30

Mark Prewitt  
Vice President, Pipeline Safety & Compliance  
National Grid  
40 Sylvan Road  
Waltham, MA 02451

Re: D.P.U. 20-PL-30, [REDACTED] LNG Facility Comprehensive Inspection  
(December 2019)

Dear Mr. Prewitt:

The Pipeline Safety Division (“Division”) of the Department of Public Utilities (“Department”) issues this Notice of Probable Violation (“NOPV”) to Boston Gas Company d/b/a National Grid (“National Grid” or “Company” or “Respondent”) regarding its [REDACTED] [REDACTED] Liquefied Natural Gas (“LNG”) facility pursuant to 220 CMR 69.03 and Delegation Order, D.P.U. 18-44-A (2018).

During December 2019, the Division completed a comprehensive inspection of the LNG facility, pursuant to G.L. c.164, §§ 76 and 105A, and 220 CMR 69.02. The inspection included

the review of operating, maintenance, security procedures, training, and records for compliance with 49 C.F.R. Part 193 (“Part 193”). The findings of the inspection are highlighted below

I. FINDINGS

A. PLANS AND PROCEDURES

Part 193, § 193.2017(c)(2) states, “Each operator must review and update the plans and procedures required by this part -- (2) At intervals not exceeding 27 months, but at least once every 2 calendar years.”

**1. Concern:** Part 193, § 193.2011 requires reporting incidents, safety-related conditions, and annual pipeline summary data in accordance with 49 C.F.R. Part 191. National Grid’s General Policy G32 - Notification to Regulatory Agencies (Rev. 4) references Part 191, § 191.15(c) when it should be § 191.15(d), and does not include a reference to §191.15(c). This indicates that National Grid has not reviewed and updated this provision since 2016, when § 191.15 was amended.

**Response:** National Grid recognized that a formatting error was not identified at the time. The policy has been updated and the formatting error has been corrected.

**2. Concern:** The Emergency Plan and associated reference documents have not been updated since 2016 and contain several errors and omissions including:

- The evacuation manual references an Appendix I Page 8: Evacuation Plan Pg. 6 of 7. The attachment does not exist; the reference should be to Appendix A.
- There are five UV/IR devices listed but there are six at the plant.
- SOP Event Level 2 – Response to moderate incident section states: “Notify all agencies. See Section 2.0 for notifications.” The reference to Section 2 is incorrect. It is also mentioned in Event Level 4. There is also a typographical error, referencing section 4.2 instead of 2.2.

**Response:** National Grid recognized that the [REDACTED] documents needed to be updated to align with the Company’s other LNG facilities.

**3. Concern:** National Grid’s review of General Policy G11 - Standard for Corrosion Control of LNG Plants, and General Policy G12 - Corrosion Control Evaluation Policy for LNG Plants exceeded 27 months (from 5/2016 to 10/2018).

**Response:** National Grid confirmed that its review of General Policies G11 and G12 exceeded the required 27-month review cycle. These policies have since been reviewed.

B. OPERATIONS

Part 193, § 193.2503(d) states, “Each operator shall follow one or more manuals of written procedures to provide safety in normal operation and in responding to an abnormal operation that would affect safety. The procedures must include provisions for: (d) Purging and inerting components according to the requirements of § 193.2517.”

**1. Concern:** The Company’s procedure, G02 - Isolation and Purging, does not state what edition of “Purging Principles and Practices” is required.

**Response:** The Company’s procedure, G02 - Isolation and Purging, references Part 193, § 193.2517 (Purging) and § 193.2615 (Isolating and Purging). Both code requirements point back to Part 193, § 193.2013 (What documents are incorporated by reference partly or wholly in this part), which specifies American Gas Association, “Purging Principles and Practices,” 3rd edition, June 2001, (Purging Principles and Practices), IBR approved for §§ 193.2513(b) and (c), 193.2517, and 193.2615(a).

The Division agrees with National Grid that Part 193, § 193.2013 -- which states the required edition -- is referenced in the code section noted in the procedure. Nevertheless, reference to the code section that references Part 193, § 193.2013 does not ensure that the individual responsible for this task will know or verify that the appropriate edition of this document is being utilized. Thus, the required edition should be stated in the procedure.

Section 193.2503(g) states, “Each operator shall follow one or more manuals of written procedures to provide safety in normal operation and in responding to an abnormal operation that would affect safety. The procedures must include provisions for: (g) Cooldown of components according to the requirements of §193.2505.

**2. Concern:** General Policy G1 - Cryogenic Piping and Equipment Cool Down (Rev. 12/17) states that section 3 is removed and placed in Training Manual - TMII Module I. This change is not in the training manual. The revision sheet indicates changes to Section 2.1 regarding temperature, but Section 2.1 does not reference temperature in any way.

**Response:** National Grid recognized that the document was missing the revision and has since corrected the Training Manual to include the relevant information.

**3. Concern:** National Grid's Cooldown Procedure Revision 8 is not being used by the operators. Operators are using Revision 7.

**Response:** National Grid confirmed that the Division finding is correct.

**4. Concern:** The Vaporization Cooldown section is missing records (for 2016, 2017, and 2019) when compared to the Vaporization records.

**Response:** National Grid recognized that not all cooldowns were recorded in the cooldown binder.

**4. Concern:** Semi-Annual (warm/cold) Cooldown inspection is conducted per TMII Module I, but General Policy G1 conflicts with this and indicates only warm season cooldown.

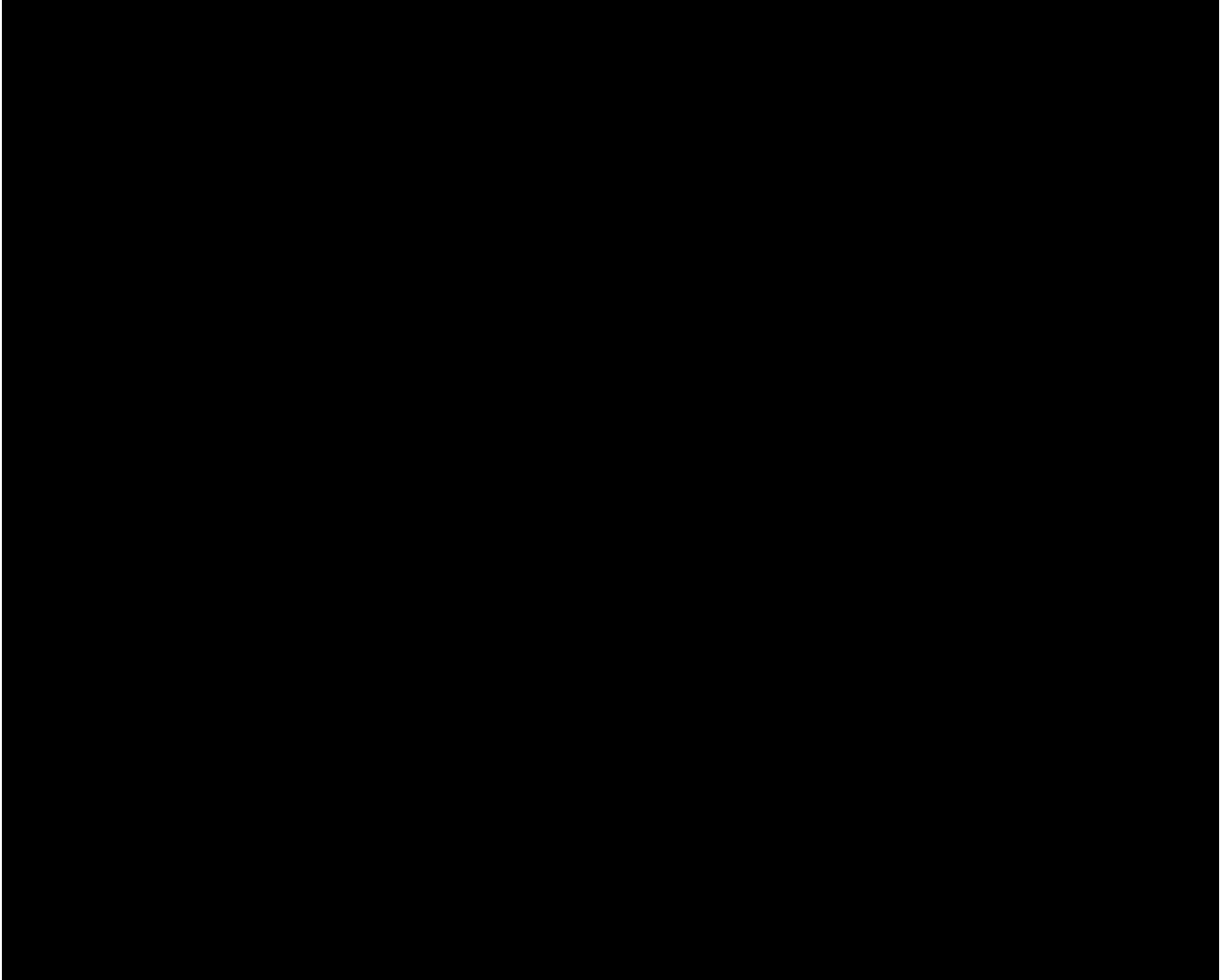
**Response:** National Grid confirmed that the Division finding is correct in that the policy needed revision.

**5. Concern:** Cooldown references TMII Module I Cooldown program, which has a review/revision date of 6/2017; this exceeds the review requirement of Part 193, § 193.2017(c)(2).

**Response:** National Grid confirmed that the Division finding is correct.

Section 193.2509(b)(3) states, "To adequately handle each type of emergency identified under paragraph (a) of this section and each fire emergency, each operator must follow one or more manuals of written procedures. The procedures must provide for the following: (3) Coordinating with appropriate local officials in preparation of an emergency evacuation plan,

which sets forth the steps required to protect the public in the event of an emergency, including catastrophic failure of an LNG storage tank.”



C. MAINTENANCE

Section 193.2617(b) states, “For repairs made while a component is operating, each operator shall include in the maintenance procedures under § 193.2605 appropriate precautions to maintain the safety of personnel and property during repair activities.”

**1. Concern:** General Policy G3 - Lock Out Tag Out (“LOTO”) is a high-level procedure. The operator has LOTO Work Permit binders (open/closed) with forms. General

Policy G3 says to use LNG Dept. Work Permit System but there is not a procedure for Work Permits. Binders observed for Work Permits: General “Work Permit,” LOTO Work Permit, and Hot Work Permit. Binders are in place both open and closed, by year, but lacking procedures.

**Response:** General Policy G06 - Repair to Operating Systems is the correct policy which provides guidance on the process to evaluate the need for repairs made while a component is operating. The Company provides training for both Company and contractor employees on the work permit system: Training Manual Section II Safety Section, Modules C (Lock & Tag), D (Permit to Work (Work Permit System)), and E (Fire Watch Requirements).

The Division finds that although the training covers the General Policy G3 LOTO methods, there should be a plant procedure.

Section 193.2619(c)(1) states, “Control systems used seasonally, such as for liquefaction or vaporization, must be inspected and tested before use each season.”

**2. Concern:** National Grid provided a “LNG Seasonal Equipment PSSR Checklist” but there is no specific procedure related to the seasonal checklist.

**Response:** The Seasonal Control Systems are calibrated and checked annually and included in the Company’s PSSR (pre-start up safety review) which is completed prior to startup. During instrument calibrations, the Company performs loop checks, contracts with both the glycol manufacturers to check equipment and SIS system vendor to perform checks.

The Division finds that National Grid did not provide a specific procedure related to the PSSR Checklist.

Section 193.2619(d) states, “Control systems that are normally in operation, such as required by a base load system, must be inspected and tested once each calendar year but with intervals not exceeding 15 months.”

**3. Concern:** General Policy G44 - Plant Locked Valve Program and CP-M-TS-LV Operation and Annual Inspection of Locked Valves require all locked valves (open or closed) to be reviewed for accuracy or current relevance, inspected, and operated. The 2017 annual inspection record was missing.

**Response:** The Division’s finding is correct. A note has been added to the folder to acknowledge the 2017 annual inspection record is missing.

Section 193.2619(e) states, “Relief valves must be inspected and tested for verification of the valve seat lifting pressure and reseating.”

**3. Concern:** General Policy G14 references an updated procedure to follow (99.XX-MX). The Relief Valve Binder is not set up as described in G14: (a) Sections 1-9 are missing; and (b) the five-year records review showed that the reseat pressure is not being captured by the operator, only a pass/fail result.

**Response:** The Company acknowledged that Sections 1-9 are missing in the Relief Valve Binder; the binder has been updated and the records were supplied to the Division.

Additionally, the Company maintains that capturing reseating pressure is not required, as was stated in the Final Rule, Federal Register Volume 25, No. 207, Liquefied Natural Gas Facilities; Federal Safety Standards (1980):

Some commenters objected to the proposed requirement ... that the reseating pressure of relief valves be tested, arguing that such a test is impractical and not useful. [The Materials Transportation Bureau, DOT] agrees that an exact reseating pressure is not as important a safety concern as knowing that the valve will reseat and will not leak in the closed position. Thus, in view of the difficulties, the test to determine reseating pressure is deleted in the final rule under paragraph (e).

The Division finds that National Grid failed to maintain the records, but agrees with National Grid that the reseating pressure is not required.

Section 193.2623 states, “Each LNG storage tank must be inspected or tested to verify that each of the following conditions does not impair the structural integrity or safety of the tank.”

**4. Concern:** There is a missing 9/2017 record, CP-M-TS-T1 (Tank Structure, Tank 1) Review/Revision 2/16-7/18. In addition, the deficiency sheet was not always filled out.

**Response:** National Grid confirms that the Division’s finding is correct.

D. FIRE PROTECTION

Section 193.2801 states, “Each operator must provide and maintain fire protection at LNG plants according to sections 9.1 through 9.7 and section 9.9 of NFPA 59A-2001 (incorporated by reference, *see* § 193.2013). However, LNG plants existing on March 31, 2000, need not comply with provisions on emergency shutdown systems, water delivery systems, detection systems, and personnel qualification and training until September 12, 2005.”

Section 193.2017(a) states, “Each operator shall maintain at each LNG plant the plans and procedures required for that plant by this part. The plans and procedures must be available upon request for review and inspection by the Administrator or any State Agency that has submitted a current certification or agreement with respect to the plant under the pipeline safety laws (49 U.S.C. 60101 et seq.). In addition, each change to the plans or procedures must be available at the LNG plant for review and inspection within 20 days after the change is made.”

**1. Concern:** Fire Study - 4.4.4 Fire Water System states, “The required flow rate is 1000 gpm for handheld hoses plus capacity of any fixed sprinkler. As described in section 3.3.1 the present system is adequate.” The reference should be to section 3.6.1, not section 3.3.1.

**Response:** National Grid confirms that the Division’s finding is correct; the procedure needed to be reviewed. The Company has updated the Fire Study with the correct reference.

NFPA-59A-2001, Section 9.9.1 states, “Manual emergency depressurizing means shall be provided where necessary for safety. Portions of the plant that can be isolated from storage tanks or other sources of supply can be depressurized by venting to the atmosphere. The discharge shall be directed so as to minimize exposure to personnel or equipment.”

**2. Concern:** The Emergency Plan Isolation Section states, “The following tabs contain the emergency isolation procedures for critical systems at the [REDACTED] LNG Plant.” The tabs were not in the Emergency Plan. In addition, the Fire Study states that there are



a total of [REDACTED] emergency shutdowns but the emergency manual (revised 10/2019) states that there are [REDACTED] emergency shutdowns.

**Response:** National Grid confirms that the Division finding is correct; the procedure needed to be revised to include the correct number of shutdowns.

## II. ALLEGATIONS

Based on the investigation, the Division has reason to believe that Respondent failed to review and properly update procedures and test systems, failed to follow procedures, and failed to maintain records as required by Part 193. National Grid's failures may be in violation of the following sections of Part 193: §§ 193.2017(a), (c)(2); 193.2503(d), (g); 193.2509(b)(3); 193.2617(b); 193.2619(c)(1), (d), (e); 193.2623, 193.2801; NFPA-59A-2001, Section 9.9.1. The Division also has reason to believe that Respondent may be in violation of the following state pipeline safety regulations:

### 220 CMR 112.11: Plans and Procedures

(1) At each LNG plant, the operator shall prepare, adhere to, and maintain in promptly updated form the plans and procedures required by 220 CMR 112.00 and by 49 C.F.R. Part 193 for that plant. The plans and procedures shall be made available on request by the Department for review and inspection. In addition, each change to the plans or procedures shall be available at the LNG plant for review and inspection within 20 days after the change is made.

### 220 CMR 112.12: Records

(1) Each operator shall keep records adequate to substantiate compliance with 49 C.F.R. Part 193 and 220 CMR 112.00.

## III. PRIOR CONSENT ORDER VIOLATIONS

National Grid has signed the following Consent Order that pertains to similar violations of Part 193: D.P.U. 19-PL-27.

IV. PROPOSED CIVIL PENALTY

Under G.L. c. 164, § 105A, National Grid is subject to a civil penalty not to exceed \$200,000 for each violation for each day that the violation exists, up to a maximum of \$2,000,000 for any related series of violations.

In determining the amount of the civil penalty, the Division shall consider the following, pursuant to G.L. c. 164, § 105A: the appropriateness of the penalty to the size of the business of the person, firm, or corporation charged; the gravity of the violation; and the good faith of the person, firm, or corporation charged in attempting to achieve compliance, after notification of a violation.

In the present matter, the Division has reviewed the circumstances of the allegations and is prepared to resolve this matter upon National Grid's agreement to the terms in the attached Consent Order and payment of a civil penalty in the amount of \$50,000.

V. RESPONSE TO THIS NOPV

Within 30 days of receipt of this NOPV, National Grid shall respond to the Division in one of the following ways, pursuant to 220 CMR 69.04:

1. Sign and return the attached Consent Order, thus agreeing to remit payment of the civil penalty by check or money order made payable to the Commonwealth of Massachusetts;
2. Submit an offer in compromise of the proposed civil penalty under 220 CMR 69.04(2);
3. Request an informal conference under 220 CMR 69.05; or
4. Submit a written reply to the Division disputing the allegation(s) contained in the NOPV. The reply must include a complete statement of all relevant facts and authority and full description of the reasons why the Respondent disputes the allegation(s) contained in the NOPV.

Failure to respond within 30 days of receipt of this NOPV will be deemed an admission to the allegations contained herein and a waiver of National Grid's right to contest the allegations. If National Grid fails to respond within 30 days, the Department may, without further notice, find the facts to be as alleged herein and issue a final Order, pursuant to 220 CMR 69.04(3).

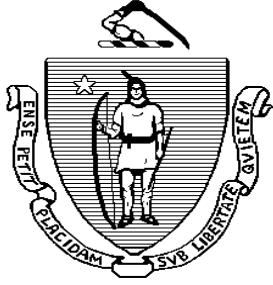
Very truly yours,

/s/

Richard Enright, Director  
Pipeline Safety Division

Enclosures: Consent Order  
Compliance Agreement

Cc: Alexander Day, National Grid  
Thomas Kubilis, National Grid  
Michael Conkey, Assistant Director, Pipeline Safety Division  
Janine D'Amico Vargas, Assistant General Counsel, Pipeline Safety Division  
Laurie Ellen Weisman, Division Counsel, Pipeline Safety Division



# The Commonwealth of Massachusetts

## DEPARTMENT OF PUBLIC UTILITIES

### CONSENT ORDER

July 29, 2020

D.P.U. 20-PL-30

In the matter of Boston Gas Company d/b/a National Grid

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#### **I. JURISDICTION**

1. This document, with the attached Compliance Agreement, is a Consent Order entered into between the Pipeline Safety Division (“Division”) of the Department of Public Utilities (“Department”) and Boston Gas Company d/b/a National Grid (“National Grid”) and is executed in accordance with 220 CMR 69.08.
2. The Division has authority to enter into this Consent Order on behalf of the Department pursuant to Delegation Order, D.P.U. 18-44-A (2017).
3. Failure to comply with the terms of this Order may result in the assessment of civil penalties and referral of this matter to the Attorney General for appropriate action.
4. The terms and conditions of this Order become effective upon signing by the authorized representatives of the Respondent and the Department.
5. Respondent has stipulated and consented to the issuance of this Consent Order.

#### **II. VIOLATIONS AND CIVIL PENALTY**

1. Pursuant to G.L. c. 164, §§ 76 and 105A, and 220 CMR 69.02, the Division conducted a pipeline safety inspection of the Respondent’s facilities and records. As a result of the inspection, the Director of the Division issued to the Respondent a Notice of Probable Violation (“NOPV”), D.P.U. 20-PL-30, dated July 29, 2020, in accordance with 220 CMR 69.03. The NOPV is attached hereto and made a part hereof.
2. Based on information contained in the NOPV, the Division finds that the Respondent violated pipeline safety regulations contained in 49 C.F.R. Part 192, specifically:

**Part 193, § 193.2017(a) - Plans and procedures.**

**Part 193, § 193.2017(c)(2) - Plans and procedures.**

**Part 193, § 193.2503(d) – Operating procedures.**

**Part 193, § 193.2503(g) – Operating procedures.**

**Part 193, § 193.2509(b)(3) – Emergency procedures.**

**Part 193, § 193.2617(b) - Repairs.**

**Part 193, § 193.2619(c)(1) - Control systems.**

**Part 193, § 193.2619(d) - Control systems.**  
**Part 193, § 193.2619(e) - Control systems.**  
**Part 193, § 193.2623 – Inspecting LNG storage tanks.**  
**Part 193, § 193.2801 - Fire protection.**  
**NFPA-59A-2001, Section 9.9.1**  
**220 CMR 112.11: Plans and Procedures**  
**220 CMR 112.12: Records**

3. Pursuant to G.L. c. 164, § 105A, the Division hereby imposes upon the Respondent a civil penalty in the amount of \$50,000 for the above-noted violations.
4. The Respondent hereby agrees, upon signing and returning this Consent Order to the Division, to remit payment of the civil penalty by check or money order in the amount of \$50,000 made payable to the Commonwealth of Massachusetts, One South Station, Boston, MA 02110.

### **III. RESPONDENT REQUIREMENTS**

1. **Respondent shall sign the Stipulation below and return this complete document to the Division.**
2. All submissions by Respondent in accordance with this Consent Order shall be addressed to:

Director  
Pipeline Safety Division  
Department of Public Utilities  
One South Station  
Boston, MA 02110

### **IV. STIPULATED TERMS**

Pursuant to 220 CMR 69.08(1), the Respondent through the signature below, by the person to whom this Consent Order is issued or a duly authorized representative, acknowledges agreement to the terms contained herein without admitting or denying that a violation of any Department or federal pipeline safety law or regulation occurred in relation to the above-noted matters. Further, Respondent agrees to issuance of this Consent Order and stipulates to the following:

1. Respondent, by signing the Stipulation, hereby waives:
  - (a) All rights to informal review pursuant to 220 CMR 69.05;
  - (b) All rights to a hearing pursuant to 220 CMR 69.06;
  - (c) Any and all procedural rights available in connection with the issuance of the Consent Order;
  - (d) All rights to seek any type of administrative or judicial review of the Consent Order;  
and

- (e) Any and all rights to challenge or contest the validity of the Consent Order.
- 2. Respondent expressly acknowledges that neither Respondent nor the Division has any intention to enter into a contract.
- 3. The terms and provisions of this Consent Order and Stipulation shall be binding upon, and inure to the benefit of, Respondent and the Division and their successors in interest.
- 4. Nothing in these Stipulated Terms shall preclude any proceedings brought by the Department to enforce the terms of the Consent Order, and nothing in these Stipulated Terms constitute, nor shall Respondent contend that they constitute, a waiver of any right, power, or authority of any other representative of the Commonwealth or an agency thereof to bring other actions deemed appropriate.

**V. FINAL ORDER**

- 1. This Consent Order and Stipulation is intended to be, and shall be construed to be, a final order of the Department issued pursuant to G.L. c. 25, § 5, having the force and effect of a remedial order, pursuant to 220 CMR 69.07(2), and expressly does not form, and may not be considered to form, a contract binding on the Division, the Department, or the Commonwealth of Massachusetts. The terms of this Consent Order and Stipulation, including this paragraph, are not subject to amendment or modification by any extraneous expression, prior agreement, or prior arrangements between the Division and the Respondent, whether oral or written.

By Order of the Division

\_\_\_\_\_ Date: \_\_\_\_\_  
Richard Enright, Director  
Pipeline Safety Division  
Department of Public Utilities

**The undersigned, duly authorized, stipulates to and acknowledges agreement to the terms herein.**

**BOSTON GAS COMPANY D/B/A NATIONAL GRID**

\_\_\_\_\_ Date: \_\_\_\_\_  
Mark Prewitt  
Vice President, Pipeline Safety & Compliance

COMPLIANCE AGREEMENT  
BETWEEN THE DEPARTMENT OF PUBLIC UTILITIES  
AND BOSTON GAS COMPANY D/B/A NATIONAL GRID

D.P.U. 20-PL-30

Boston Gas Company d/b/a National Grid (“National Grid”) [REDACTED] LNG Facility (“Respondent”) agrees to take the following actions within the specified time periods:

1. Within 30 days of the effective date of this Order, National Grid shall pay a civil penalty of \$50,000 to the Commonwealth of Massachusetts.
2. Within 30 days of the effective date of this Order, National Grid shall provide to the Pipeline Safety Division an updated copy of General Policy G32 - Notification of Regulatory Agencies.
3. Within 30 days of the effective date of this Order, National Grid shall provide to the Pipeline Safety Division an updated copy of the Plant Evacuation Plan and associated reference documents. National Grid shall review and update the reference documents in intervals of 24 months not to exceed 27 months.
4. Within 30 days of the effective date of this Order, National Grid shall provide to the Pipeline Safety Division an updated copy of General Policies G11 - Standard for Corrosion Control of LNG Plants and G12 - Corrosion Control Evaluation Policy for LNG Plants.
5. Within 30 days of the effective date of this Order, National Grid shall update plant procedures that reference the “American Gas Association, “Purging Principles and Practices,” to state the applicable edition.
6. Within 30 days of the effective date of this Order, National Grid shall review and update its Training Manual Section II. Safety, Module I Cool Down Program and General Policy G1 - Cryogenic Piping and Equipment Cool Down. The revision sheet shall be updated.
7. Within 40 days of the effective date of this Order, National Grid shall provide documentation to the Pipeline Safety Division showing that it has satisfied the requirements of Item 5 and 6.
8. Within 30 days of the effective date of this Order, National Grid shall review Cooldown documentation requirements with appropriate personnel.
9. Within 40 days of the effective date of this Order, National Grid shall provide documentation to the Pipeline Safety Division showing that it has satisfied the requirements of Item 8. Documentation shall include the following: 1) documents reviewed; 2) date of review; 3) trainer; and 4) names and titles of trained personnel.
10. Within 40 days of the effective date of this Order, National Grid shall provide [REDACTED]  
[REDACTED]  
[REDACTED]

11. Within 40 days of the effective date of this Order, National Grid shall develop work permit procedures.
12. Within 45 days of the effective date of this Order, National Grid shall develop procedures for documenting and maintaining documentation as it relates to General Procedure – G05-Control Systems.
13. Within 45 days of the effective date of this Order, National Grid shall develop procedures for LNG Seasonal Control Systems as it relates to pre-startup safety reviews.
14. Within 50 days of the effective date of this Order, National Grid shall provide documentation to the Pipeline Safety Division showing that it has satisfied the requirements of Items 10-13.
15. Within 30 days of the effective date of this Order, National Grid shall update CP-M-TS-T1 (Tank Structure, Tank 1) Maintenance Procedures to include a method to indicate when no deficiencies are found during maintenance activity.
16. Within 45 days of the effective date of this Order, National Grid shall provide documentation to the Pipeline Safety Division to demonstrate that appropriate plant personnel have been trained in proper recordkeeping as it relates to CP-M-TS-T1 (Tank Structure, Tank 1) Maintenance Procedures. The documentation shall include the following: document reviewed, date of training, trainee, title and name of individuals trained.
17. Within 30 days of the effective date of this Order, National Grid shall provide to the Pipeline Safety Division an updated Relief Valve Binder with missing Sections 1-9.
18. Within 45 days of the effective date of this Order, National Grid shall require supervisors to review valve testing records to ensure completion of documents. This shall be added to testing procedure requirements. Those areas of the testing document that are not applicable should be identified in that manner on the form. The review shall be documented.
19. Within 50 days of the effective date of this Order, National Grid shall provide documentation to the Pipeline Safety Division showing that it has satisfied the requirements of Item 18.
20. Within 30 days of the effective date of this Order, National Grid shall provide to the Pipeline Safety Division copies of missing 2018 relief valve test records and identify any resolved missing records. In addition, National Grid shall explain the resolution of the missing records.
21. Within 30 days of the effective date of this Order, National Grid shall provide to the Pipeline Safety Division an updated copy of Fire Study showing the correct reference to section 3.6.1



22. Within 30 days of the effective date of this Order, National Grid shall provide to the Pipeline Safety Division an updated copy of the Emergency Plan Isolation Section showing the correct number of shutdowns.