

From: Craig Hoffman
To: ANDREW WILSON III; b.buchynsky@dgc-us.com; c.curry@dgc-us.com; doug.u...
CC: Docket Optical System
Date: 2/11/2011 1:19 PM
Subject: Mariposa Energy Project - gas blow restrictions
Attachments: MEP Condition no gas blows.doc

DOCKET	
09-AFC-3	
DATE	<u>FEB 11 2011</u>
RECD.	<u>FEB 11 2011</u>

Mariposa Committee, Applicant and interested parties

This is a follow up to our pre-hearing conference. Staff had indicated we would be proposing a condition for gas blows.

Attached is a draft condition of certification and some discussion that staff will be adding to the Hazardous Materials Management Section for the Mariposa Project. This condition will be included by staff in all current and future projects.

Urgent recommendations to amend NFPA 54, OSHA regulations, ASME B31.1, and all 50 state fire codes to prohibit "gas blows" have gone out from the US Chemical Safety and Hazard Board (CSB) as a result of their review of gas line purging and cleaning accidents, such as the one at Middletown, Connecticut last year and at Fairfield, California in 2003. The reports and recommendations are available at CSB's website (<http://www.csb.gov/>).

Let me know if you need more information, or if you have comments.

Craig Hoffman
Project Manager

California Energy Commission
Siting, Transmission and Environmental Protection Division
1516 Ninth Street, MS 15
Sacramento, CA 95814
phone: 916-654-4781
cell: 916-261-6405
fax: 916-654-3882

Draft Proposed Condition of Certification Preventing Gas Blows

Discussion: On June 28 2010 the United States Chemical Safety and Hazard Board (CSB) issued Urgent Recommendations to the United States Occupational Safety and Health Administration (OSHA), the National Fire Protection Association (NFPA), the American Society of Mechanical Engineers (ASME), and major gas turbine manufacturers to make changes to their respective regulations, codes, and guidance to require the use of inherently safer alternatives to natural gas blows for the purposes of pipe cleaning. Recommendations were also made to the fifty states to enact legislation applicable to power plants that prohibits flammable gas blows for the purposes of pipe cleaning. In accordance with those recommendations, staff proposes **Condition of Certification HAZ-8** which prohibits the use of flammable gas blow for pipe cleaning at the facility either during construction or after the start of operations.

All fuel gas pipe purging activities shall vent any gases to a safe location outdoors, away from workers and sources of ignition. Fuel gas pipe cleaning and purging shall adhere to the provisions of most current versions of the National Fuel Gas Code (NFPA 54) including all Temporary Interim Amendments.

HAZ-8: The project owner shall not allow any fuel gas pipe cleaning activities on site, either before placing the pipe into service or at any time during the lifetime of the facility, that involve “flammable gas blows” where natural (or flammable) gas is used to blow out debris from piping and then vented to atmosphere. Instead, an inherently safer method involving a non-flammable gas (e.g. air, nitrogen, steam) or mechanical pigging shall be used. Exceptions to any of these provisions will be made only if no other satisfactory method is available, and then only with the approval of the CPM.

Verification: At least 30 days before any fuel gas pipe cleaning activities involving fuel gas pipe of four-inch or greater external diameter, the project owner shall submit a copy of the Fuel Gas Pipe Cleaning Work Plan which shall indicate the method of cleaning to be used, what gas will be used, the source of pressurization, and whether a mechanical PIG will be used, to the CBO for information and to the CPM for review and approval.