

PI-84-0102

June 1, 1984

Mr. V. E. Beacon
Vice President
Commercial and Division Operations
Northern States Power Company
100 North Barstow Street
P. O. Box 8
Eau Claire, Wisconsin 54702

Dear Mr. Beacon:

This responds to your letter of May 22, 1984, regarding the proposed construction of a Wilding at the Eau Claire LNG plant site. The building would house five LNG plant personnel and serve as a gas/electric meter maintenance shop.

In our opinion, the regulations in 49 CFR Part 193 do not prohibit construction of the building at the Eau Claire LNG plant site. It is important to note, however, that if the building is to be tied in relation to any of the LNG plant processes, it would qualify as an "LNG facility" under the definition of that term in Part 193, and be subject to applicable Part 193 requirements. Moreover, even if the proposed building is not an "LNG facility", since it is to be located on the LNG plant site, it would be subject to the gas monitoring and alarm requirements of 81.93.2819(f).

We do not think that the mere housing of LNG plant personnel during the course of non-LNG related meter repair duties would be a usage sufficiently connected to LNG plant processes to qualify the building as an "LNG facility." A more direct connection to LNG processes would be required. For example, your letter said the personnel may perform security and operational response functions. If in so doing they use communication, control, or monitoring equipment that is located in the building, the building would provide a direct link to plant processes that would qualify the building as an "LNG facility." Examples of other usages that would make the building an "LNG facility's would be the housing of emergency equipment, maintenance vehicles, or maintenance materials.

We hope this information is helpful to you.

Sincerely,
Original signed by
Richard L. Beam
Associate Director for
Pipeline Safety Regulation
Materials Transportation Bureau

Northern States Power Company
100 North Barstow Street
P.O. Box 8
Eau Claire, Wisconsin 54702

May 22, 1984

Mr. Richard Beam
Associate Director for Pipeline Safety Regulation
Materials Transportation Bureau
400 Seventh Street S.W.
Washington, DC 20590

Dear Mr. Beam:

On Tuesday, May 15, 1984, our Engineer in Gas Operations, Perry Kuznar, spoke with your associate, Walt Dennis, on our proposal to build a combination gas/electric meter shop/maintenance building on our Eau Claire, Wisconsin LNG Plant site. Our concern was that the existing 193 Code would disallow its construction on that site for reasons within the Code. Upon talking with Mr. Dennis, however, it was decided that the proposed building could be built on our site due to the following:

1. Eau Claire LNG Plant was built in 1968 and put into production on September 2, 1969. This preceded the introduction of the 49 CFR Part 193 rules. The plant was built under the rules of NFPA 59A, 1967 edition. There were no provisions for the regulation of new buildings on site at this time.
2. The proposed shop will house 5 LNG operators. These operators will have dual ratings in LNG operation and in electric or gas meter repair. Having these men on site will give the following advantages:
 - a. Operators on site for at least 8 hours per day versus the approximate 2 hours per day at present. Security of both the plant and its functions are greatly enhanced.
 - b. Response to plant alarms or malfunctions can be handled quickly by men on site versus calling men in from a distant source.
 - c. Operators will be exposed more to the plant and thus remain more familiar with it than someone who works there on a rotating basis (as we do now).

As was discussed with Mr. Dennis, we plan to make this new facility as safe as possible for the occupants who work in it. We realize that although our plant is grandfathered, we still must try to conform to the highest safety standards possible for our given situation.

In conclusion, we'd like to thank Mr. Dennis for his time to give us this information. Walt had said to keep on file all information necessary on our plant and the codes it was built under for future reference, if needed, by your office. We, therefore, are going to actively pursue the building of this combination meter shop maintenance building on the Eau Claire LNG Plant site. If, for any reason you have exception to this proposed building, we ask that you inform us of such in writing by June 30, 1984. After that time we will commence with the construction of the building.

Thank you very much for your help.

Sincerely,
V. E. Beacom
Vice President
Commercial and Division Operations