Evans Roger

From: Evans Roger
Sent: Thursday, October 18, 2018 3:02 PM
To: El-zoghbi Muhamed
Subject: PLD18MR003 -- Merrimack -- Mention of Overpressurization within CMA DIMP

6.1.6 Equipment Failure

Equipment Failure leaks are caused by malfunctions of control and r equipment including regulators, valves, meters, compressors, or o instrumentation or functional equipment, Failures may be from threa components, flanges, collars, couplings and broken or cracked components from O- ring failures, Gasket failures, seal failures, and failures in packing or sin leaks. Leaks caused by overpressurization resulting from malfunction of contro alarm device; relief valve malfunction: and valves failing to open or close command; or valves which opened or closed when not commanded to do (source: PHMSA instructions for Form 7100.1-1).

Should a minor threat under Equipment Failure be found to be signific additional detail pertaining to that minor threat will be reviewed during the DI Steering Team annual review. Data to support the review will be obtained thro the Company's Facility Failure Report process (refer to GS 1652.010 "Investiga of Failures"). Should the additional detail yield a new minor threat, the minor th will be added to Table B-1. The results of that review will be documented on 10-1 form.

(a) Malfunction of Control/ Relief Equipment – Debris on Seat - This th category includes activation of gas involving control and relief equipm

Muhamed,

For the record I wanted to share the two places within DIMP that mention overpressurization.

Roger

6.1.7 Incorrect Operations

Incorrect Operation leaks result from inadequate procedures or safety practi or failure to follow correct procedures, or other operator error. It includes le due to improper valve selection or operation, inadvertent overpressurizatio improper selection or installation of equipment (source: PHMSA instruction Form 7100.1-1).

Should a minor threat under Incorrect Operations be found to be signific additional detail pertaining to that minor threat will be reviewed during the D Steering Team annual review. Data to support the review will be obtained thro the Company's Facility Failure Report process (refer to GS 1652.010 "Investiga of Failures"). Should the additional detail yield a new minor threat, the minor th will be added to Table B-1. The results of that review will be documented on 10-1 form.

(a) Loose Connection –This threat category includes loose connections are known to be due to human error.

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