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PUCO

From: Boger, Ethan [mailto:eboger@belcan.com]
Sent: Monday, January 30, 2017 4:33 PM
To: Puco ContactOPSB <contactopsb@puco.ohio.gov>
Cc: Alan Ullman (AHUllman@fuse.net) <AHUllman@fuse.net>; oreilljt@ucmail.uc.edu; Haynes Goddard (haynes.goddard@uc.edu) <haynes.goddard@uc.edu>
Subject: Duke Informational Meeting 26 Jan 2017

To: OPSB

Sirs,

At the subject meeting Duke spokesman introduced a new characterization of the proposed pipeline, from "transmission line" to "distribution line". According to Duke, this redefinition is possible due to the change in pipe wall from 3/8-inch to 7/16-inch, which reduces the nominal hoop stress in the pipe wall to below 20% of yield stress. This change by itself has no impact on the PIR, which remains at 307 feet or the radius of the HUD-mandated evacuation zone, which remains at 1023 ft. However, the integrity management plan for a distribution line mandated by 49CFR Section 192 is far less extensive than that mandated for a transmission line, and makes no mention of a need to define areas of high consequence. The application recently submitted to PUCO makes no mention of this redefinition. Since redefining the pipeline has significant regulatory implications and may seriously affect the safety of residents within the evacuation zone, if Duke wishes to do so they should amend and resubmit their application. The amended application should clearly state that the pipeline has been redefined and how this impacts the integrity management plan.

Respectfully,
Ethan Boger
Blue Ash, Ohio

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