PS09-001 COMPLIANCE REVIEW NOTES

- On the incident day – March 14, 2009 – corrosion leaks were discovered in the 1950's vintage bare steel main in front of the auto shop.
- A previous corrosion leak had been fixed in the same location in 2004.
- MDU went to replace this bare steel main after the 2004 leak and found when they dug to connect to the main on the west side of Maple Street just west of the incident site (not at the incident site) that it was coated so replacement did not occur. After the 2009 incident it was determined it was bare east of Maple Street to the incident site and beyond. It also showed the bare section of this main as coated on their system maps. When leaks showed up in 2007, the leaks were not fixed.
- MDU standards required that one cathodic test point reading be taken for every 3 amps of impressed current. MDU was operating under the assumption that the incident main was part of the larger cathodic protection region in the area while in fact it had become isolated electrically perhaps due to an un-bonded Dresser coupling. A new random cathodic protection read selection system implemented by MDU should help detect isolated segments in the future. The standards also state that test point selection should be based on known areas of corrosion and areas with low readings both of which existed at the incident site. No readings were taken at the incident site in the last 5 years and none on this isolated main section in the last 5 years also.
- 2007 rectifier readings were probably taken by the late corrosion technician but were not transferred from his field notes prior to his untimely passing away in February 2008. If the readings were taken, one could view the violation as a more minor paperwork violation of 192.491 which states that corrosion records will be maintained for 5 years rather than the violation stated on the Summary of Deficiencies form.