

**U.S. Chemical Safety and
Hazard Investigation Board**

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Hon. Rafael Moure-Eraso
Chairperson

Hon. John S. Bresland
Board Member

Hon. Mark Griffon
Board Member



Gregory Higgins, Assistant General Counsel
Mitsubishi Power Systems, Inc.
100 Colonial Center Parkway, Suite 500
Lake Mary, FL 32746

MAR 12 2012

Dear Mr. Higgins:

As you know, the U.S. Chemical Safety and Hazard Investigation Board (CSB) issued two recommendations to Mitsubishi Power Systems, Inc. (MPSA) pursuant to its investigation of the February 7, 2010 natural gas explosion at Kleen Energy, a natural gas-fueled, combined-cycle power plant under construction in Middletown, CT.

These recommendations read as follows:

Recommendation No. 2010-07-I-CT-UR7:

Provide to your customers:

- a. *Comprehensive technical guidance on inherently safer methods for cleaning fuel gas piping, such as the use of air or pigging with air.*
- b. *Comprehensive Cleaning Force Ratio (CFR) guidelines, specifying both the upper and lower limits required to obtain satisfactory cleaning for the fuel gas piping for purposes of the warranties of the turbines.*
- c. *Warnings against the use of fuel gas to clean pipes.*

Recommendation No. 2010-07-I-CT-UR13:

Work with the Electric Power Research Institute to publish technical guidance addressing the safe cleaning of fuel gas piping supplying gas turbines. At minimum:

- a. *For cleaning methodology, require the use of inherently safer alternatives such as air blows and pigging with air in lieu of flammable gas.*
- b. *Provide technical guidance for the safe and effective use of alternative methods for cleaning such as air and pigging with air.*

I am writing to inform you that the Board voted on February 22, 2012 to designate Recommendation No. 2010-07-I-CT-UR13 with the status "**Closed- Acceptable Action.**" This status reflects the Board's determination that MPSA has met the intent of this recommendation and that no additional action is necessary. The Board was pleased to learn that MPSA collaborated with the Electric Power Research Institute in the production of its recently published *Guidelines for Fuel Gas Line Cleaning Using Compressed Air or Nitrogen.*

With regard to Recommendation No. 2010-07-I-CT-UR7, we are in receipt of Dr. Koenke's February 4, 2012 e-mail and MPSA's Standard Procedure No. M501-GAC. The Office of Recommendations is reviewing these materials and will follow-up with you shortly regarding any

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clarifications and/or additional information that may be necessary before the Board may consider this recommendation for closure. Please do not hesitate to contact CSB Recommendations Specialist Christina Morgan if you have questions or concerns regarding the CSB's recommendation to MPSA and/or the policies and procedures of CSB's Office of Recommendations. Ms. Morgan may be reached at 202-261-7642 or Christina.Morgan@csb.gov.

Thank you for your efforts to protect the safety and health of workers and the public at large.

Sincerely,

Rafael Moure-Eraso for RME

Rafael Moure-Eraso, PhD, CIH
Chairperson

CC: Carlos Koeneke, Vice President, Project Engineering, MPSA
Don Holmstrom, Director, Western Regional Office, CSB
Manuel R. Gomez, Director of Recommendations, CSB
Christina Morgan, Recommendations Specialist, CSB