

SAFETY OF GAS TRANSMISSION PIPELINES: MAOP RECONFIRMATION, EXPANSION OF ASSESSMENT REQUIREMENTS, AND OTHER RELATED AMENDMENTS

Docket No. PHMSA - 2011-0023; Amdt Nos. 191-26; 192-125

ACTIVITIES FOR CONSIDERATION

ADMINISTRATIVE

Review HCA analysis to determine if MCAs should be same, housed within IMP or elsewhere-determine advantages/disadvantages for business purposes

Modify procedures

The reporting of exceedances of MAOP

Modify Gas O&M to reflect reporting changes for safety related conditions, exceedance of MAOP, and notification guidelines (§ 192.18)

Modify O&M to reflect class location changes to include current and determination must be documented/retained

Review paperwork for class location changes – must be complete, accurate, demonstrate how class location determined, and current

Modify programs to include references to all new documents incorporated by reference

Modify programs to include all new regulatory language

Assist with ensuring new compliance deadlines are captured

Adjust workflow and or processes as necessary dependent on who owns the changes

Consider a glossary for all the new definitions

Access to the newly referenced standards and documents (there are 3 industry standards just for ILI assessments)

TRAINING & QUALIFICATION

Welder qualifications must be maintained for 5 years following construction

Plastic pipe and qualifying persons to make joints – qualifications must be maintained for 5 years following construction

Create and develop training for various stakeholders

TRACEABLE VERIFIABLE & COMPLETE

Reconfirm MAOPs where applicable and retain associated paperwork

Create an acceptable TVC process for the company, one you are willing to live with

Ensure TVC so that material properties verification is not necessary

Record management for life of pipe

Reconfirm the maximum allowable operating pressure of previously untested natural gas transmission pipelines and pipelines lacking certain material records where applicable

Pipeline component records – retain for operational life of component – add to job books, where applicable

TVC records review & analysis – identify gaps

OPERATIONS & MAINTENANCE GENERAL

Install safety features on in-line inspection launchers and receivers or confirm that they are already in place

Create road/highway database for every state in which you operate

Identify MCAs

The periodic assessment of pipelines in “Moderate Consequence Areas” areas not designated as “high consequence areas,” to include arterial roads and highways

Review what applies to gathering, watching cross references to ensure no unintended consequences (§ 192.67 applies to Type A gathering for material properties and record keeping)

Review where there is plastic pipe, ensuring there is only gathering in gas service, records for pipe design retain for life of pipe

INTEGRITY MANAGEMENT

New integrity management requirements (such as: consideration of seismicity as a risk factor plus preventive & mitigative measures, engineering analysis)

QC/QA spatial data for repository

ILI assessments and the newly referenced standards provide details that need to be addressed in the IMP, such as use of tethered or remote-controlled ILI tools, qualifications and certification requirements, and specific details of ILI inspections

IMP process development

6-month grace period for 7-calendar-year integrity management reassessment intervals, related recordkeeping, and operator must ask permission

Risk matrix developed and reviewed, integrating new information

Identify gaps with definitive timelines for closure, given informational analysis and integration of data, knowns and unknowns.

Assess all applicable pipelines for inclusion into IMP and setting into place deadlines and compliance activities.