



# National Transportation Safety Board

Washington, D.C. 20594

Office of the Chairman

OCT 19 2011

The Honorable Cynthia L. Quarterman  
Administrator  
Pipeline and Hazardous Materials  
Safety Administration  
Washington, DC 20590

Dear Administrator Quarterman:

Thank you for your August 4, 2011, letter updating the status of six open Safety Recommendations (P-01-2, P-04-1, P-04-4, and P-09-1 through -3), which the National Transportation Safety Board (NTSB) issued to the Pipeline and Hazardous Materials Safety Administration (PHMSA) between 2001 and 2009.

Safety Recommendation P-01-2, stated below, was issued on June 22, 2001, as a result of the NTSB's investigation of the July 7, 1998, natural gas explosion and fire in South Riding, Virginia.

## P-01-2

Require that excess flow valves [EFV] be installed in all new and renewed gas service lines, regardless of a customer's classification, when the operating conditions are compatible with readily available valves.

The NTSB is aware of ongoing efforts by PHMSA, industry, and governmental agencies regarding the issue of EFVs, including the publication of a final rule mandating integrity management of gas distribution pipelines and EFVs for single-family residences. We are pleased that, in the fall of 2011, PHMSA expects to publish an Advance Notice of Proposed Rulemaking requesting comment concerning technical feasibility, curb valve installations as EFV alternatives, benefit and cost factors, and whether to establish, enhance, and/or adopt technical standards or guidance for the EFVs, among other issues. We note that PHMSA is also seeking responses from operators regarding their experiences, practices, benefits, and costs related to EFV installation.

The NTSB reminds PHMSA, however, that if the final rules are not revised as requested, this recommendation may be reclassified "unacceptable." Accordingly, we urge PHMSA to amend its regulations to require EFVs on all new and renewed service lines for all gas service customers, regardless of their classification. In the interim, pending further updates from PHMSA, Safety Recommendation P-01-2 remains classified "Open—Acceptable Response."

Safety Recommendations P-04-1 and -3, stated below, were issued on July 1, 2004, as a result of our investigation of the Enbridge pipeline rupture and crude oil release near Cohasset, Minnesota, on July 4, 2002.

#### P-04-1

Remove the exemption in 49 *Code of Federal Regulations* [CFR] 192.65(b) that permits pipe to be placed in natural gas service after pressure testing when the pipe cannot be verified to have been transported in accordance with the American Petroleum Institute's [API's] recommended practice RP 5L1.

Because PHMSA is continuing its efforts to remove the exemption in 49 CFR 192.65(b) as requested, Safety Recommendation P-04-1 is classified "Open—Acceptable Response."

#### P-04-3

Evaluate the need for a truck transportation standard to prevent damage to pipe, and, if needed, develop the standard and incorporate it in 49 *Code of Federal Regulations* Parts 192 and 195 for both natural gas and hazardous liquid line pipe.

We note PHMSA's participation in the technical committee meetings related to the standard for truck transportation being developed by the API, which is expected to be published in mid-2012. We also note that, once PHMSA has reviewed this document, it may initiate rulemaking for incorporation by reference into the Federal regulations, possibly in summer 2013. Accordingly, Safety Recommendation P-04-3 is classified "Open—Acceptable Response," pending completion of this action. Given the time that has elapsed since the issuance of this recommendation, we encourage PHMSA to adhere to this proposed timeline.

Safety Recommendation P-09-1 was issued on October 27, 2009, as a result of the NTSB's investigation of the November 1, 2007, rupture of a hazardous liquid pipeline with release and ignition of propane at Carmichael, Mississippi.

#### P-09-1

Conduct a comprehensive study to identify actions that can be implemented by pipeline operators to eliminate catastrophic longitudinal seam failures in electric resistance welded pipe (ERW); at a minimum, the study should include assessments of the effectiveness and effects of in-line inspection tools, hydrostatic pressure tests, and spike pressure tests; pipe material strength characteristics and failure mechanisms; the effects of aging on ERW pipelines; operational factors; and data collection and predictive analysis.

#### P-09-2

Based on the results of the study requested in Safety Recommendation P-09-1, implement the actions needed.

The NTSB understands that Battelle Memorial Institute is conducting a study to identify actions that will enable pipeline operators to eliminate catastrophic longitudinal seam failures in ERW pipe. The study, expected to be completed in November 2012, will then be used to address Safety Recommendation P-09-2. Pending completion of the study, Safety Recommendation P-09-1 is classified "Open—Acceptable Response." Pending implementation of necessary remedies that the study identifies, Safety Recommendation P-09-2 is classified "Open—Acceptable Response."

P-09-3

Initiate a program to evaluate pipeline operators' public education programs, including pipeline operators' self-evaluations of the effectiveness of their public education programs. Provide the National Transportation Safety Board with a timeline for implementation and completion of this evaluation.

The NTSB is pleased that PHMSA and state pipeline safety agencies have initiated public awareness inspections in the first quarter of fiscal year 2011 and that you are training additional Federal and state inspectors in using the inspection forms and conducting public awareness inspections. We also note that PHMSA is planning to complete all Federal public awareness inspections, including interstate agent agreement inspections, by December 31, 2012, and is encouraging states to develop an inspection plan and conduct public awareness inspections, if possible, within the same timeframe. Because these actions satisfy Safety Recommendation P-09-3, this recommendation is classified "Closed—Acceptable Action."

We would appreciate receiving periodic updates on these initiatives as progress continues to address Safety Recommendations P-01-2, P-04-1 and -3 and P-09-1 and -2. If you would like to submit a response electronically rather than in hard copy, you may send it to the following e-mail address: [correspondence@ntsb.gov](mailto:correspondence@ntsb.gov). If your response includes attachments that exceed 5 megabytes, please e-mail us asking for instructions on how to use our secure mailbox. To avoid confusion, please use only one method of submission (that is, do not submit both an electronic copy and a hard copy of the same response letter).

Sincerely,



Deborah A.P. Hersman  
Chairman

cc: Ms. Linda Lawson, Director  
Office of Safety, Energy, and Environment  
Office of Transportation Policy