

May 3, 2006

Mr. Brigham A. McCown
Acting Administrator
Pipeline and Hazardous Materials
Safety Administration
Washington, D.C. 20590

Dear Mr. McCown:

Thank you for your August 23, 2005, and November 10, 2005, letters addressing Safety Recommendations P-98-25 and -30, P-02-4, and P-04-7, stated below, which the National Transportation Safety Board issued to the Pipeline and Hazardous Materials Safety Administration (PHMSA), formerly the Research and Special Programs Administration (RSPA).

Safety Recommendation P-98-25 was issued to PHMSA as a result of the Safety Board's investigation of the October 23, 1996, pipeline accident of a ruptured natural gas pipeline in Tiger Pass, Louisiana.

P-98-25

Require pipeline system operators to precisely locate and place permanent markers at sites where their gas and hazardous liquid pipelines cross navigable waterways.

Because PHMSA worked with the Common Ground Alliance (CGA) to develop and issue an industry best practice that provides underwater facility owners guidance on the proper placement and maintenance of visible permanent markers, Safety Recommendation P-98-25 is classified "Closed—Acceptable Alternate Action."

Safety Recommendation P-98-30 was issued to PHMSA as a result of the Safety Board's investigation of the June 26, 1996, pipeline rupture and release of fuel oil at Fork Shoals, South Carolina. This recommendation is on the Board's Most Wanted list of safety recommendations.

P-98-30

Assess the potential safety risks associated with rotating pipeline controller shifts and establish industry guidelines for the development and implementation of pipeline controller work schedules that reduce the likelihood of accidents attributable to controller fatigue.

PHMSA published Advisory Bulletin ADB-05-6 in the *Federal Register* on August 11, 2005. This bulletin provides industry guidelines developed in response to U.S. Department of Transportation Human Factors Coordinating Committee research of the potential safety risks associated with rotating pipeline controller shifts. Because the issuance of ADB-05-6 satisfies the intent of the recommendation, Safety Recommendation P-98-30 is classified “Closed—Acceptable Action.”

Safety Recommendation P-02-4 was issued to PHMSA as a result of the Safety Board’s investigation of the June 10, 1999, pipeline accident involving a 16-inch-diameter steel pipeline that ruptured with subsequent fire in Bellingham, Washington.

P-02-4

Develop and issue guidance to pipeline operators on specific testing procedures that can (1) be used to approximate actual operations during the commissioning of a new pumping station or the installation of a new relief valve, and (2) be used to determine, during annual tests, whether a relief valve is functioning properly.

The Safety Board notes that on August 10, 2005, PHMSA issued Advisory Bulletin ADB-05-5, which provides guidance to pipeline operators on inspecting and testing procedures for pilot-operated relief valves. The guidance applies to used, new, replaced, or relocated pilot-operated relief valves, and is also used during periodic inspection and testing of these valves. ADB-05-5 provides specific steps that operators’ valve inspection and testing procedures should include to determine whether these valves function properly. The issuance of ADB-05-5 completes the recommended action; accordingly, Safety Recommendation P-02-4 is classified “Closed—Acceptable Action.”

Safety Recommendation P-04-7 was issued to PHMSA as a result of the Safety Board’s investigation of the April 7, 2003, explosion of a Conoco Phillips Company gasoline storage tank and subsequent fire in Glenpool, Oklahoma.

P-04-7

Revise the emergency response planning requirements in the pipeline safety regulations to include coordination with electric and other utilities that may need to respond to a pipeline emergency.

The Safety Board notes that on May 23, 2005, PHMSA issued Advisory Bulletin ADB-05-3, which provides guidance to pipeline operators in complying with the emergency procedure requirements at 49 *Code of Federal Regulation* 192.615 and 195.402(e). In addition, PHMSA worked with the National Association of State Fire Marshals (NASFM) to prepare a guidance bulletin for fire and emergency response personnel to reinforce the importance of including all utilities in the Incident Command System. With the NASFM, PHMSA selected 10 sites to provide State workshops on emergency response; the workshops began in the fall of 2005. PHMSA also added consideration of a best practice on emergency response to the agenda at the recent semiannual meeting of the 34 regional alliances of the CGA and stressed the importance of the practice. These

actions satisfy the recommendation; accordingly, Safety Recommendation P-04-7 is classified “Closed—Acceptable Alternate Action.”

Thank you for your commitment to pipeline safety.

Sincerely,

/s/

Mark V. Rosenker
Acting Chairman

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