



# National Transportation Safety Board

Washington, D.C. 20594

Office of the Chairman

JUN 14 2002

Honorable Ellen G. Engleman  
Administrator  
Research and Special Programs Administration  
Washington, D.C. 20590

Dear Ms. Engleman:

Thank you for your April 17, 2002, letter updating the status of action being taken to implement Safety Recommendations P-01-1 and -2, stated below. These recommendations were issued to the Research and Special Programs Administration (RSPA) by the National Transportation Safety Board on June 22, 2001, as a result of its investigation of the July 7, 1998, natural gas explosion and fire in South Riding, Virginia.

## P-01-1

Require gas utility operators to maintain a specified minimum separation distance, sufficient to protect against both thermal and mechanical damage, between plastic gas service lines and underground electrical facilities whenever they install a new gas service line or perform maintenance on existing lines.

RSPA has advised the Safety Board that it will investigate underground separation between gas and electrical service lines in conjunction with its damage prevention best practices initiative. RSPA is working with the Common Ground Alliance (CGA) to investigate damage prevention solutions, including development of recommendations for minimum separation distance to protect plastic gas service lines from damage resulting from proximity to other underground facilities (including electrical lines). RSPA indicates that (1) through a cooperative agreement with CGA, RSPA and the CGA will evaluate the separation requirements in the *National Electric Safety Code* (NESC) and (2) an NESC study demonstrated that 12-inch separation is usually adequate.

RSPA advises that after reviewing the CGA's work, it will look at the Commonwealth of Virginia's new separation regulations, will consult with state and local officials, and will seek public comments on the underground separation issue. RSPA will then determine whether changes are necessary in the pipeline safety regulations for vertical and horizontal separations on mains and the extension of separation requirements to gas service lines. These initiatives are all responsive to the objective of the Board's recommendation. Accordingly, Safety Recommendation P-01-1 is classified "Open—Acceptable Response," pending the completion of RSPA's action to address this issue.

P-01-2

Require that excess flow valves [EFVs] 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.

RSPA reports that it enlisted the Volpe National Transportation Systems Center to provide an analysis of the state of EFV technology, standards, and deployment and to examine current costs and benefits, and that this analysis is expected to be completed by summer 2002. Following its review of the study's findings and consultation with the Safety Board, the gas distribution industry, and the public, RSPA reports it will determine whether requiring the installation of EFVs on new and renewed gas service lines for residential and commercial customers will be beneficial. While the Safety Board would be pleased to discuss the results of the study with RSPA, and is always open to consider alternative approaches, we continue to believe that EFV installation should be required in these particular service lines. Accordingly, Safety Recommendation P-01-2 is classified "Open—Acceptable Response" pending the outcome of RSPA's actions and further information from RSPA on this issue.

Thank you for your commitment to pipeline safety. The Safety Board looks forward to hearing from you concerning the implementation of Safety Recommendations P-01-1 and -2.

Sincerely,



Marion C. Blakey  
Chairman

cc: Mr. Robert Clarke, Safety and Health Team Leader  
Office of Transportation Policy Development