National Transportation Safety Board

Washington, D.C. 20594

Office of the Vice Chairman

NOV 21 2003

Mr. Samuel G. Bonasso
Acting Administrator
Research and Special Programs Administration
Washington, D.C. 20590

Dear Mr. Bonasso:

Thank you for your August 15, 2003, response to the National Transportation Safety Board regarding Safety Recommendations P-03-1, -2 and -3, stated below. These recommendations were issued to the Research and Special Programs Administration (RSPA) as a result of the Safety Board's pipeline accident investigation of a natural gas pipeline rupture and fire near Carlsbad, New Mexico, on August 19, 2000.

P-03-1

> Revise 49 *Code of Federal Regulations* Part 192 to require that new or replaced pipelines be designed and constructed with features to mitigate internal corrosion. At a minimum, such pipelines should (1) be configured to reduce the opportunity for liquids to accumulate, (2) be equipped with effective liquid removal features, and (3) be able to accommodate corrosion monitoring devices at locations with the greatest potential for internal corrosion.

The Safety Board notes that in early 2004, RSPA expects to issue a proposed rule to address internal corrosion issues in the design and construction of gas transmission pipes. RSPA indicates that the rule will require pipeline operators to implement measures to reduce the opportunity for liquids to accumulate and provide for effective liquid removal features. Pending issuance of a final rule addressing the recommendation, Safety Recommendation P-03-1 is classified "Open—Acceptable Response."

P-03-2

> Develop the requirements necessary to ensure that pipeline operators' internal corrosion control programs address the role of water and other contaminants in the corrosion process.

The Safety Board notes that in late 2003, RSPA intends to publish a final rule on gas integrity management that will address the role of water and other contaminants in the internal corrosion process and the procedures for prevention, inspection, and repair. The rule will require

operators using direct assessment to follow the requirement in standard ASME/ANSI B31.8S, Appendix SP-B2. Pending publication of the final rule as described, Safety Recommendation P-03-2 is classified "Open—Acceptable Response."

P-03-3

> Evaluate the Office of Pipeline Safety's pipeline operator inspection program to identify deficiencies that resulted in the failure of inspectors, before the Carlsbad, New Mexico, accident, to identify the inadequacies in El Paso Natural Gas Company's internal corrosion control program. Implement the changes necessary to ensure adequate assessments of pipeline operator safety programs.

The Safety Board notes that in early 2004, RSPA expects to complete work to revamp its inspection protocols, and improve its inspection tracking and coordination with its legal office to ensure that violations of its regulations are enforced more effectively. Pending completion of the recommended actions, Safety Recommendation P-03-3 is classified "Open—Acceptable Response."

Thank you for your timely response to these safety recommendations. We look forward to receiving an update regarding the completion of actions outlined in your letter.

Sincerely,

Mark V. Rosenker
Vice Chairman

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