SEP 2 0 2007

Ms. Krista L. Edwards
Acting Administrator
Pipeline and Hazardous Materials
Safety Administration
Washington, D.C. 20590

Dear Ms. Edwards:

This letter concerns Safety Recommendation P-03-1, stated below, which the National Transportation Safety Board issued to the Pipeline and Hazardous Materials Administration (PHMSA), formerly the Research and Special Programs Administration, on February 27, 2003, as a result of the Safety Board's 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* [CFR] 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 has reviewed PHMSA's final rule, published in the *Federal Register* on April 23, 2007, "Design and Construction Standards to Reduce Internal Corrosion in Gas Transmission Lines." The Board is pleased to note that a new subsection cross-references the design and installation requirements, specifically addressing corrosion control in 49 CFR Part 192, Subpart I, "Requirements for Corrosion Control." The final rule also adds a new section to Subpart I, Section 192.476, to require an operator to address internal corrosion risk when designing and constructing a new gas transmission line or when replacing line pipe or components in a transmission line.

The Safety Board further notes that 49 CFR 192.476(a) imposes a general performance requirement that the design and construction of new and replaced pipelines include features to reduce

the risk of internal corrosion. An operator must provide three categories of corrosion control: (1) configuration to reduce the risk that liquids will collect in the line, (2) effective liquid removal features, and (3) the ability to use corrosion monitoring devices in locations with significant potential for internal corrosion. In addition, Section 192.150 now requires an operator to design most new and replaced transmission lines to allow the use of instrumented internal inspection devices, with this limited exemption: certain lower risk gathering lines and those too small in diameter to accommodate instrumented internal inspection devices. Paragraph (b) removes exceptions to applicability; paragraph (c) requires an operator to consider and address the impact of changes in the physical features of a pipeline on internal corrosion risks of existing pipelines downstream, which will ensure that changes in configuration that are made after a pipeline begins operation do not inadvertently increase the risk of internal corrosion. Paragraph (d) requires an operator to maintain records demonstrating compliance with the regulations and to follow written procedures, which can be supported by the as-built drawings and other construction records.

Because the final rule incorporated all the recommended changes, Safety Recommendation P-03-1 is classified "Closed—Acceptable Action."

Thank you for your commitment to pipeline safety.

Sincerely,

ORIGINAL SIGNED BY

Mark V. Rosenker
Chairman

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