April 15, 2004

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

Dear Mr. Bonasso:

Thank you for your February 17, 2004, letter updating the status of action taken to implement Safety Recommendation P-01-1, stated below. The National Transportation Safety Board issued this recommendation to the Research and Special Programs Administration (RSPA) 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.

The Safety Board understands that RSPA investigated underground separation between gas and electrical service lines in conjunction with its damage prevention best practices initiative and worked with the Common Ground Alliance (CGA) to investigate damage prevention solutions. These solutions included development of recommendations for minimum separation distance to protect plastic gas service lines from damage resulting from proximity to other underground facilities, such as electrical lines and other pipelines. Through a cooperative agreement, RSPA and the CGA evaluated the separation requirements in the National Electric Safety Code (NESC): this evaluation determined that a 12-inch separation is usually adequate. On September 26, 2003, the CGA Board of Directors approved a new best practice, stated below, to address the minimum separation of underground utilities, which addresses the interactions of all types of utility lines that could exist in a common trench:

> When installing new direct buried supply facilities in a common trench, a minimum of 12 inch radial separation should be maintained between supply facilities such as steam lines, plastic gas lines, other fuel lines, and direct buried electrical supply lines. If 12 inches separation cannot be feasibly attained at the time of installation, then mitigating measures should be taken to protect lines against damage that might result from proximity to other structures. Examples may include the use of

insulators, casing, shields or spacers. If there is a conflict among any of the applicable regulations or standards regarding minimum separation, the most stringent should be applied.

In addition, RSPA implemented a regional partnership program and participated in the group's first meeting in December 2003 to strengthen damage prevention initiatives among national, regional, State, and local damage prevention groups and to promote the use of damage prevention best practices. The program includes more than 19 partners, including regional organizations in Colorado, Georgia, Minnesota, Missouri, Ohio, Tennessee, and Wisconsin. To effectively manage this initiative and improve implementation of damage prevention best practices, RSPA's Office of Pipeline Safety (OPS) has hired a Community Assistance and Technical Support (CATS) inspector, for each of the five pipeline safety regional offices, to work with the CGA and one-call centers. According to RSPA, the CATS inspectors work with the CGA to promote regional partnerships through industry presentations, conventions, e-mail lists, and one-call centers.

Because the CGA's best practice, coupled with the OPS CATS inspection program, provide an acceptable alternative solution to the recommended action, Safety Recommendation P-01-1 is classified "Closed—Acceptable Alternate Action."

Thank you for your commitment to pipeline safety.

Sincerely,

Original Signed By:

Mark V. Rosenker
Vice Chairman

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