



National Transportation Safety Board

Washington, D.C. 20594

MAY 06 2010

Office of the Chairman

The Honorable Cynthia L. Quarterman
Administrator
Pipeline and Hazardous Materials
Safety Administration
Washington, DC 20590

Dear Ms. Quarterman:

Thank you for your March 5, 2010, letter regarding Safety Recommendation P-05-5, stated below. The National Transportation Safety Board (NTSB) issued this recommendation to the Pipeline and Hazardous Materials Safety Administration (PHMSA) on December 23, 2005, as a result of the NTSB's study on supervisory control and data acquisition (SCADA) systems in liquid pipelines.

P-05-5

Require operators to install computer-based leak detection systems on all lines unless engineering analysis determines that such a system is not necessary.

The NTSB notes that PHMSA addressed this issue by requiring operators, under its Integrity Management regulations, to deploy an interconnected set of required layers of protection to detect and repair hazardous liquid pipeline leaks at the soonest possible time, to mitigate any damages appropriately, and to continuously improve the cumulative performance of these interlinked protections in leak detection. These protections include, but are not limited to, customized leak detection technology deployment; periodic risk-based assessment; and defect repair prioritized by environmental consequence, corrosion management, pipeline rights-of-way surveillance, public awareness leading to citizen identifications of leaks, emergency preparedness and response (including ongoing liaison with emergency responders); and lessons learned and applied from accident analyses and investigations.

The NTSB also notes that, on January 26, 2010, PHMSA published an advisory bulletin (ADB-10-01) informing operators of PHMSA's expectations regarding pipeline leak detection systems on both network and less complex point-to-point pipeline systems. Any operator that has a point-to-point pipeline system is required to perform an engineering analysis to determine whether a computerized leak detection system is necessary, and, if a system is determined to be unnecessary, the operator is required to perform a line balance at no greater than 1-hour intervals whenever material is flowing through the line. The NTSB believes that ADB-10-01 will reinforce the integrity management requirements for hazardous liquid pipeline operators. Because PHMSA has

implemented an acceptable alternate process that meets the intent of the recommendation, Safety Recommendation P-05-5 is classified "Closed—Acceptable Alternate Action."

Thank you for your commitment to pipeline safety.

Sincerely,



Deborah A.P. Hersman
Chairman

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