

5-1-09

Ms. Cynthia Douglass
Acting Deputy Administrator
Pipeline and Hazardous Materials
Safety Administration
Washington, D.C. 20590

Dear Ms. Douglass:

Thank you for the September 17, 2008, letter from Mr. Rick Kowalewski, Acting Assistant Administrator/Chief Safety Officer, regarding Safety Recommendation P-05-5, stated below. The National Transportation Safety Board issued this recommendation to the Pipeline and Hazardous Materials Safety Administration (PHMSA) on December 23, 2005, as a result of the Safety Board'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 Safety Board has reviewed Mr. Kowalewski's letter as well as the PHMSA report on leak detection systems, which was required by Section 21 of the Pipeline Inspection, Protection, Enforcement, and Safety (PIPES) Act. The letter provides a comprehensive overview of action completed as required by the Act and includes a discussion about what can be done to foster the development of more effective technologies.

However, while many of the actions outlined in the letter will enhance leak detection and management, the Safety Board is disappointed that PHMSA has not identified any specific initiative to require operators to install computer-based leak detection systems. On August 8, 2006, the Safety Board classified Safety Recommendation P-05-5 "Open—Acceptable Response" pending the results of the discussion of computer-based systems at a June 27, 2006, public meeting. On March 18, 2008, in response to PHMSA's July 31, 2007, update to Safety Recommendations P-05-1 through -5, the Board advised that compliance with the PIPES Act would satisfy P-05-1 through -4 but that, to satisfy P-05-5, PHMSA needed to require operators to install computer-based leak detection systems; consequently, pending further action from PHMSA, Safety Recommendations P-05-1 through -5 were classified "Open—Acceptable Response."

While PHMSA has expended some effort to address the requirements of Section 21 of the PIPES Act, it has not identified any specific initiative to require operators to install computer-based

leak detection systems as requested. Accordingly, pending implementation of the recommendation, Safety Recommendation P-05-5 is classified “Open—Unacceptable Response.”

Sincerely,

/S/

Mark V. Rosenker
Acting Chairman

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