

December 29, 2010

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

Dear Administrator Quarterman:

Thank you for your September 1, 2010, letter updating the status of Safety Recommendations P-09-1 through -3, stated below. The National Transportation Safety Board (NTSB) issued these recommendations to the Pipeline and Hazardous Materials Safety Administration (PHMSA) on October 27, 2009, as a result of the NTSB's investigation of the November 1, 2007, rupture of a hazardous liquid pipeline with release and ignition of propane at Carmichael, Mississippi.

P-09-1

Conduct a comprehensive study to identify actions that can be implemented by pipeline operators to eliminate catastrophic longitudinal seam failures in electric resistance welded pipe (ERW); at a minimum, the study should include assessments of the effectiveness and effects of in-line inspection tools, hydrostatic pressure tests, and spike pressure tests; pipe material strength characteristics and failure mechanisms; the effects of aging on ERW pipelines; operational factors; and data collection and predictive analysis.

P-09-2

Based on the results of the study requested in Safety Recommendation P-09-1, implement the actions needed.

The NTSB is aware that on November 3, 2009, PHMSA solicited a comprehensive research project proposal regarding low-frequency ERW pipeline failures on the government website FedBizOps. The project was to include, but not be limited to, an assessment of current methods to test and detect flaws and a study of failure mechanisms in ERW pipelines. We are disappointed to learn that PHMSA received only four white papers and one proposal and that the proposal was not recommended for award by the review panel. However, the NTSB is encouraged that PHMSA plans to solicit proposals once again in early FY 2011. Pending the outcome of this effort and subsequent implementation of the study's recommendations, Safety Recommendation P-09-1 and -2 are classified "Open—Acceptable Response."

P-09-3

Initiate a program to evaluate pipeline operators' public education programs, including pipeline operators' self-evaluations of the effectiveness of their public education programs. Provide the National Transportation Safety Board with a timeline for implementation and completion of this evaluation.

The NTSB is aware that PHMSA has worked on the issue of pipeline public awareness, has published regulations at 49 *Code of Federal Regulations* 192.6 and 195.440, and has issued Advisory Bulletin ADB-06-02 requesting pipeline operators to submit their written public awareness programs to PHMSA's Public Awareness Program Clearinghouse for review, using American Petroleum Institute's Recommended Practice (RP) 1162 as the comparison document. PHMSA now reports that, since the adoption of the RP, Federal and state inspection staffs review public awareness elements during standard inspections of pipeline operators, and these inspections generally include a review of written programs and/or a review of records verifying program implementation.

The NTSB notes that trade associations and pipeline operators have shared lessons learned from implementing their public awareness programs consistent with RP 1162 and the RP's incorporation by reference into the Federal pipeline safety regulations and that a June 2010 workshop was held in Houston, Texas, by representatives from the Pipeline Safety Trust, the results of which will aid in the development of an evaluation plan for public awareness programs. These inspections will focus on how operators evaluated their program for effectiveness, the results and documentation, and any improvements that were identified and/or implemented. Inspector training and data collection will also be addressed and, starting in the first and second quarters of FY 2011, pilot inspections will be conducted to gain more insight and validate the inspection tools. Pending completion of these efforts, Safety Recommendation P-09-3 is classified "Open—Acceptable Response."

Thank you for your commitment to pipeline safety. We would appreciate receiving periodic updates on these initiatives as progress continues to address Safety Recommendations P-09-1 through -3. If you would like to submit these updates electronically rather than in hard copy, you may send them to the following e-mail address: [correspondence@ntsb.gov](mailto:correspondence@ntsb.gov). If a response includes attachments that exceed 5 megabytes, please e-mail us at the same address for instructions on how to use our secure mailbox. To avoid confusion, please use only one method of submission (that is, do not submit both an electronic copy and a hard copy of the same response letter).

Sincerely,

/s/

Deborah A.P. Hersman  
Chairman

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

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Office of Safety, Energy, and Environment  
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