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DEPARTMENT OF TRANSPORTATION

Pipeline Safety Advisory Bulletin ADB-94-04 Offshore Operators,

Emergency Planning Coordination

AGENCY: Research and Special Programs Administration (RSPA), DOT.

ACTION: Advisory to offshore pipeline operators on coordinating emergency planning with offshore producers.

SUMMARY: This advisory calls the attention of offshore pipeline facility operators to a safety recommendation by the National Transportation Safety Board (NTSB) regarding the need for emergency planning and coordination between themselves and offshore producers.

Advisory

As a result of NTSB accident report NTSB/PAR-90/02 and NTSB Safety Recommendation P-90-31, on an incident on October 3, 1989, involving a Natural Gas Pipeline Company of America (NGPL) underwater transmission line in the Gulf of Mexico, this advisory bulletin informs offshore pipeline operators of the following report findings:

(a) The accident report records the following shortcomings in the transmission line operator's emergency plan for offshore emergencies

(NTSB's rationale is in parenthesis):

(1) Inadequate guidance for Gas Control personnel on notification procedures (when NGPL Gas Control personnel were first notified of the accident, they failed to contact the district superintendent directly).

(2) Inadequate guidance on the duties and responsibilities of the emergency coordinator (the district superintendent failed to properly fulfill his duties as emergency coordinator because of a lack of guidance in the NGPL emergency plan).

(3) Inadequate guidance for liaison and coordination with public officials (although the NGPL emergency plan listed a telephone number for the Coast Guard, NGPL took no action to establish liaison with local Coast Guard officials).

(4) Inadequate guidance for liaison and coordination with offshore producers (neither the NGPL emergency plan nor the district superintendent had an emergency telephone number with which to contact personnel responsible for the unmanned offshore production platform where automatic shutdown equipment was located and which failed to shut off gas flow into the failed pipeline).

(b) With respect to item (a)(3) above, the requirements for emergency plans in 49 CFR 192.615 for gas pipelines, and similar requirements in 49 CFR 195.402(e) for hazardous liquids pipelines, require operators to establish and maintain adequate communication and liaison with appropriate fire, police and other public officials. As noted in (a)(3) above, the operator failed to establish adequate means of communication and liaison with the local Coast Guard (public officials) as required by 49 CFR 192.615.

Background

This advisory bulletin is based on two offshore pipeline failures and an NTSB safety recommendation. In March 1989, an ARCO production platform in the Gulf of Mexico was engulfed in flames and destroyed when a sudden release of gas ignited during repairs to a Southern Natural Gas Company (SONAT) 18" offshore pipeline. There were seven fatalities. In preparing for the repair work, SONAT began venting the pipeline to atmosphere through piping at the ARCO platform. Unfortunately, and unbeknown to SONAT, venting came to a halt when ARCO personnel isolated the platform by closing valves on all pipelines entering the platform, including SONAT's 18" pipeline (ARCO did this in preparation for some platform maintenance work). As a result, the 18" pipeline which the SONAT crew began to repair, and which they thought had been safely vented free of flammables, still contained some gas and liquids. A cutting machine was being used on the pipeline's 18" riser at the platform, and as cutting neared completion, the pipe separated unexpectedly, releasing gas and liquids which ignited. In the judgment of Federal accident investigators, a lack of adequate coordination between both the producer's (ARCO) and the pipeline operator's (SONAT) field personnel was a significant contributing factor.

In October 1989, another pipeline failure involving fatalities occurred in the Gulf of Mexico. A fishing vessel, the Northumberland (crew of 14), punctured an NGPL 16" underwater transmission line carrying natural gas at 835 psig pressure. The escaping gas ignited almost immediately, creating a fireball which completely destroyed the vessel. Eleven (11) crew members perished. The incident happened at approximately 6:00 PM. However, gas flow feeding the fire was not fully shut off for over three hours, until shortly after 9:15 PM. According to the NTSB report, a major contributing factor in this long delay was the lack of a telephone number for contacting the operators of an unmanned production platform [refer to (a)(4) above]. As a result, NTSB Safety Recommendation P-90-31 was issued to RSPA, as

follows:

- Evaluate, with the assistance of the Minerals Management

Service, the need for emergency planning and coordination between offshore pipeline operators and producers, and then implement, if necessary, appropriate safety regulations.

- The NTSB report also noted an inadequacy involving communications with local Coast Guard officials [refer to (b) above] and shortcomings [refer to (a)(1) through (a)(5) above].

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Associate Administrator for Pipeline Safety.

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