



U.S. Department  
of Transportation  
**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

November 8, 2023

The Honorable Maria Cantwell  
Chair, Committee on Commerce,  
Science, and Transportation  
United States Senate  
Washington, DC 20510

Dear Chair Cantwell:

Section 19(c) of the Pipeline Safety Improvement Act of 2002 (Pub. L. No. 107-355) requires the U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA) to submit an annual report to Congress on any pipeline safety recommendations made by the National Transportation Safety Board (NTSB) during the prior year and to provide a copy of PHMSA's response for each recommendation. This letter is submitted in fulfillment of this requirement.

During Calendar Year 2022, NTSB issued three safety recommendations to PHMSA, as listed in the enclosed report. The report also provides PHMSA's response to those recommendations. We take our responsibility to address all NTSB recommendations seriously and will continue to work aggressively to close all open recommendations.

Please let me know if you require additional information or have your staff contact Samantha Keitt, Director of Governmental, International, and Public Affairs, by phone at 202-934-2417 or by e-mail at [samantha.keitt@dot.gov](mailto:samantha.keitt@dot.gov).

A similar letter has been sent to the Ranking Member of the Senate Committee on Commerce, Science and Transportation, the Chairman and Ranking Member of the House Committee on Transportation and Infrastructure, and the Chair and Ranking Member of the House Committee on Energy and Commerce.

Sincerely,

A handwritten signature in black ink that reads "Tristan H. Brown". The signature is fluid and cursive, with a long, sweeping underline.

Tristan H. Brown  
Deputy Administrator

Enclosure



U.S. Department  
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1200 New Jersey Avenue, SE  
Washington, DC 20590

November 8, 2023

The Honorable Ted Cruz  
Ranking Member, Committee on Commerce,  
Science, and Transportation  
United States Senate  
Washington, DC 20510

Dear Ranking Member Cruz:

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November 8, 2023

The Honorable Sam Graves  
Chairman, Committee on  
Transportation and Infrastructure  
U.S. House of Representatives  
Washington, DC 20515

Dear Chairman Graves:

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November 8, 2023

The Honorable Rick Larsen  
Ranking Member, Committee on  
Transportation and Infrastructure  
U.S. House of Representatives  
Washington, DC 20515

Dear Ranking Member Larsen:

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1200 New Jersey Avenue, SE  
Washington, DC 20590

November 8, 2023

The Honorable Cathy McMorris Rodgers  
Chair, Committee on Energy and Commerce  
U.S. House of Representatives  
Washington, DC 20515

Dear Chair McMorris Rodgers:

Section 19(c) of the Pipeline Safety Improvement Act of 2002 (Pub. L. No. 107-355) requires the U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA) to submit an annual report to Congress on any pipeline safety recommendations made by the National Transportation Safety Board (NTSB) during the prior year and to provide a copy of PHMSA's response for each recommendation. This letter is submitted in fulfillment of this requirement.

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Tristan H. Brown  
Deputy Administrator

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1200 New Jersey Avenue, SE  
Washington, DC 20590

November 8, 2023

The Honorable Frank Pallone  
Ranking Member, Committee on  
Energy and Commerce  
U.S. House of Representatives  
Washington, DC 20515

Dear Ranking Member Pallone:

Section 19(c) of the Pipeline Safety Improvement Act of 2002 (Pub. L. No. 107-355) requires the U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA) to submit an annual report to Congress on any pipeline safety recommendations made by the National Transportation Safety Board (NTSB) during the prior year and to provide a copy of PHMSA's response for each recommendation. This letter is submitted in fulfillment of this requirement.

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**ANNUAL REPORT: NATIONAL TRANSPORTATION SAFETY BOARD  
CALENDAR YEAR 2022  
RECOMMENDATIONS ON PIPELINE SAFETY**

The Pipeline Hazardous Materials Safety Administration (PHMSA) is fully committed to carrying out its pipeline safety oversight authority to improve safety and protect the environment while addressing all National Transportation Safety Board (NTSB) safety recommendations. PHMSA values the role of NTSB and our collective pipeline safety partnership. We believe the already taken and planned actions described below will adequately address the safety recommendations issued to PHMSA in calendar year 2022.

**NTSB Safety Recommendation P-22-001**

**Recommendation:** Revise the calculation methodology used in your regulations to determine the potential impact radius of a pipeline rupture based on the accident data and human response data discussed in this report [PIR-22/02].

**Response:** PHMSA will strongly consider this recommendation.

PHMSA agreed to consider the recommendation and established a team to review the current potential impact radius (PIR) calculation methodology, the available accident data, and the human response data to determine if the PIR calculation methodology needed revision. Additionally, PHMSA held a public meeting in Houston, Texas, the week of December 11, 2022, during which PHMSA presented an overview of NTSB's report, *Enbridge Inc. Natural Gas Transmission Pipeline Rupture and Fire, Danville, Kentucky, August 1, 2019*, NTSB/PIR-22/02, and discussed NTSB Recommendation P-22-001 and PHMSA's plan to review the PIR calculation methodology. The meeting was very successful and PHMSA received input from stakeholders on the PIR calculation methodology. Based on the team's recommendation, PHMSA is currently evaluating next steps for possible rule revisions.

**NTSB Safety Recommendation P-22-002**

**Recommendation:** Advise natural gas transmission pipeline operators on a) the circumstances of this accident [NTSB Report PIR-22/02]; b) the need to evaluate the risks associated with flow reversal projects; and c) the impacts of such projects on hydrogen-induced cracking.

**Response:** PHMSA concurs with this recommendation.

PHMSA is in the process of updating the September 2014 advisory bulletin on flow reversal (ADB-2014-04) to include lessons learned, as well as emphasis on the need to evaluate the risks associated with flow reversal projects. The updated advisory bulletin will also provide additional considerations regarding the potential impacts of flow reversals on hydrogen-induced cracking.

At the December 2022 meeting in Houston, Texas, PHMSA presented an overview of NTSB's report, *Enbridge Inc. Natural Gas Transmission Pipeline Rupture and Fire, Danville, Kentucky, August 1, 2019*, NTSB/PIR-22/02, and Recommendation P-22-002. PHMSA informed the public of a planned review and update of the advisory bulletin to address the risks associated with flow reversals and discussed the impacts of such projects on hydrogen-induced cracking.

### **NTSB Safety Recommendation P-22-003**

**Recommendation:** Advise natural gas transmission pipeline operators of the possible data limitations associated with hard spot magnetic flux leakage in-line inspection tools and analyses used in hard spot management programs and reinforce the need to follow industry best practices when conducting in-line inspection data analysis.

**Response:** PHMSA concurs with this recommendation.

PHMSA has completed a review of accident data and information regarding hard spots and the appropriate methodologies/technologies for detecting hard spots. PHMSA continues to meet with industry and technology companies to gather more information regarding hard spot management programs. Additionally, PHMSA is in the process of developing an advisory bulletin to communicate the results of the data analysis and discuss appropriate in-line inspection technologies for different anomalies, including hard spot detection.

At the December 2022 meeting in Houston, Texas, PHMSA presented an overview of NTSB's report, *Enbridge Inc. Natural Gas Transmission Pipeline Rupture and Fire, Danville, Kentucky, August 1, 2019*, NTSB/PIR-22/02. PHMSA invited stakeholders to provide information related to methodologies/technologies used to detect hard spots that will be considered when developing the advisory bulletin. PHMSA anticipates the advisory bulletin will be completed in this calendar year.