

Plan Development and Baseline Assessment

Dave Bowmaster

Zach Barrett

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Topics To Be Discussed

- Plan Development: Key Elements
- Established Integrity Management Programs
- Credit for Prior Assessments
 - Multiple Assessments
 - Prior Assessments as Baseline Assessments
 - Baseline Inspections
 - Reassessment Intervals

Key Elements of an IMP

- Identification of covered segments
- Baseline assessment plan
- Identification of threats
 - Time dependent
 - Static or resident
 - Time independent
 - Human error
- Direct assessment plan
- Remediation requirements
- Continual evaluation and assessment
- Preventive and mitigative measures
- Performance plan
- Record keeping
- Management of change
- Quality assurance
- Communication plans
 - Safety concerns raised by OPS
 - State authorities
- Training
 - Supervisory personnel
 - Evaluation personnel
- Newly identified areas baseline assessment plan
 - Assessment schedule
 - Methods selected to assess integrity
 - Appropriate direct assessment plan
 - Process to minimize environmental and safety risks
- Data gathering and integration
- Risk assessment

Plan Development

- Over time, operators have developed integrity management plans that incorporate these key elements
- Operators have performed baseline assessments under these programs
- Operators have performed reassessments under these programs
- The rule provides limited consideration for these prior assessments

Performance-based Programs

- Allowed only after completion of baseline assessments of all segments and at least one other assessment
- No credit is given for pipelines that have multiple assessments and remediation actions as part of operator's established program
- Segments that have completed multiple assessments and successful remediation are treated as if they were never assessed
 - Baseline and reassessments prior to December 17, 1997
 - Baseline assessments prior to December 17, 1997 – reassessments prior to December 17, 2012
- Consideration should be given to allow these segments to be included in the performance-based program option outlined in the rule

Baseline Assessments Reassessment Intervals

- Operator may use an integrity assessment conducted after December 17, 1997
- Must conduct reassessment within 7 years of the baseline assessment
- This requires the operator to make a choice
 - Take credit for prior assessments and accelerate reassessment program
 - Delay the baseline assessment

Considerations for Prior Assessments

- Allow segments with multiple assessments under previous programs to be eligible for performance-based programs
- Allow segments that are reassessed during after December 17, 1997 under previous programs to be eligible for performance-based programs
- Use the provisions of ASME B31.8S, Table 8-2 to determine reassessment intervals for baseline assessments made prior to completion of system-wide baseline assessments