

# **Baseline and Reassessment Interval**

**Integrity Management for Gas Pipelines**

**Proposed Rule**

**Public Hearing March 14, 2003**

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**Integrity Task Team**

# Overlap of Baseline & Reassessment

- Throughput and Legal issues more than Technical issue
  - Significant impact on system throughput
  - Definitions & intent
  - Battelle Report and ASME B31.8s - technical foundation for reassessment

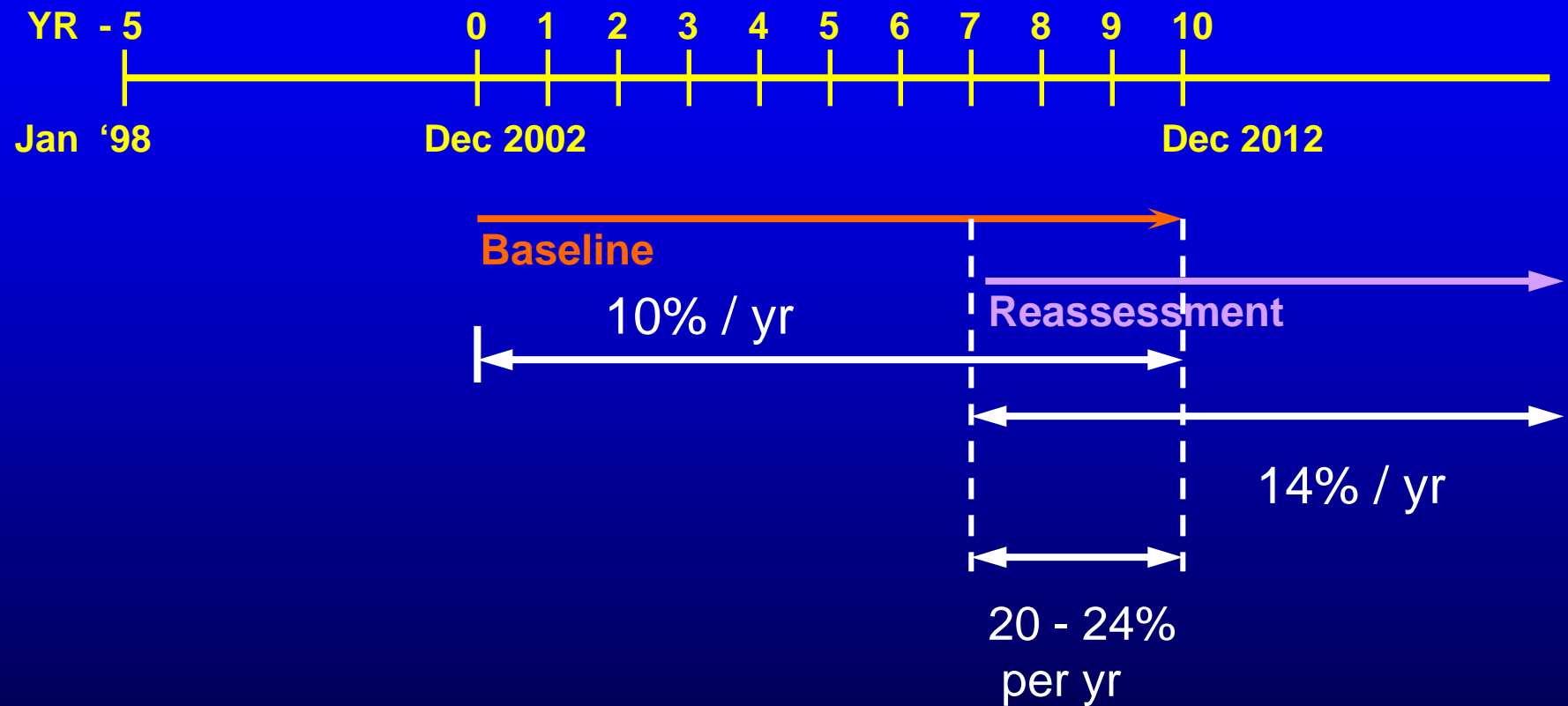
# Overlap of Baseline & Reassessment

- Congress deliberated at great length during drafting of legislation
  - OPS notes from February, 2003 Public Meeting state, Graham Hill believes **reassessment begins after completion of baseline.**
  - **“All pipelines would then be re-inspected every seven years following the 10-year interval.”** Press Release following the President signing the Pipeline Safety Improvement Act of 2002, **from office of Mr. Tauzin, Chairman of Energy and Commerce.**

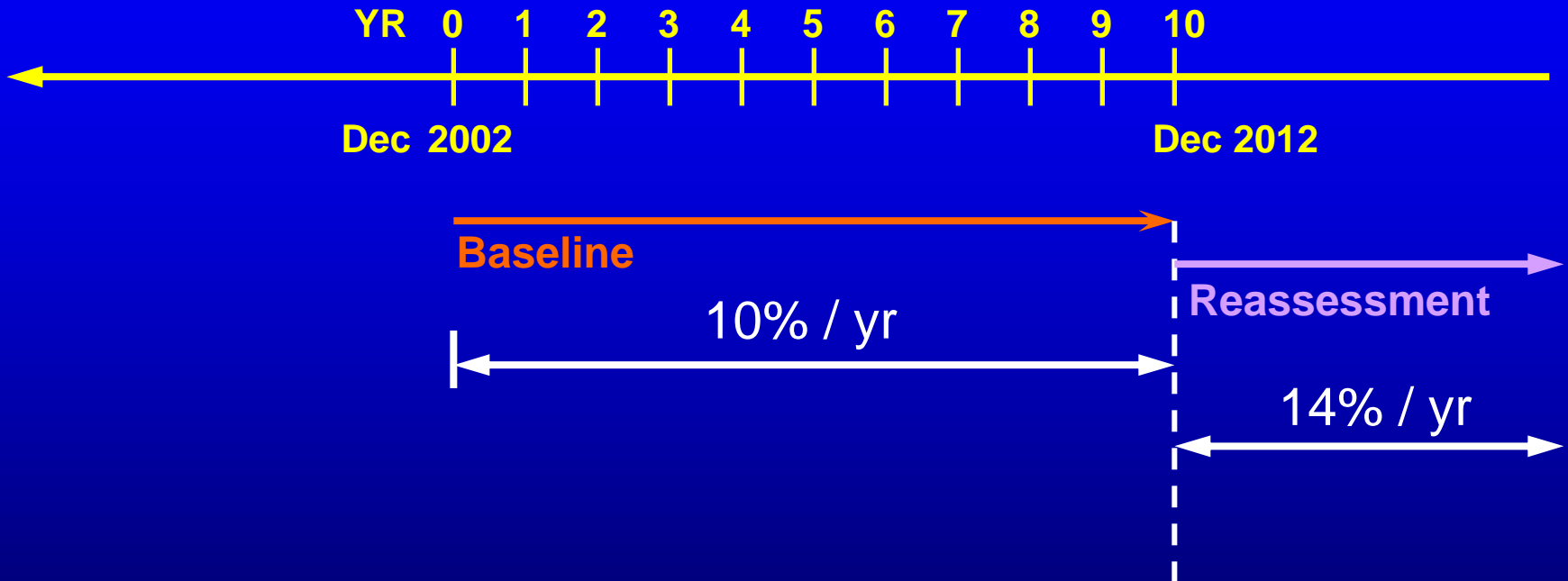
# Overlap of Baseline & Reassessment

- EEA Report & impact on throughput for various Baseline periods and Reassessment intervals
  - Specifically recognized significant effort of Baseline inspections
    - Most extensive outages for facility modifications
    - Most extensive load on service industry as they gear up
    - Most extensive outages for remediation (historical inspection data indicates an order of magnitude more actionable corrosion anomalies on 1<sup>st</sup> run inspections than on subsequent reassessments)
    - Sequencing of the steps in the preparation and execution yields overlaps - exacerbating Baseline outages
  - Resulting supply interruption and price volatility are exponential

# Overlap of Baseline and Reassessment Time Line – OPS



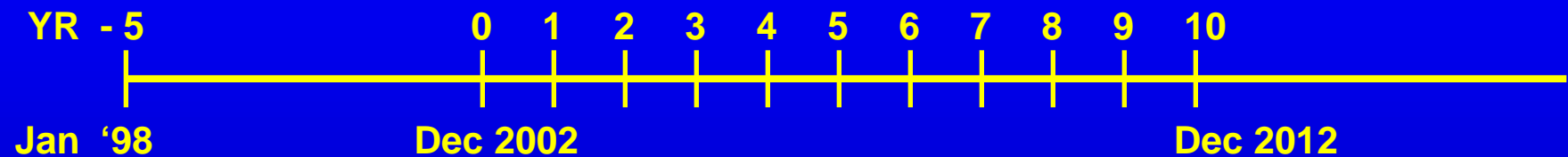
# Overlap of Baseline and Reassessment Time Line – Congress



# Consideration of Previous Inspection Data

- The “Baseline” implies 1<sup>st</sup> inspection ever
- Operators have inspection data prior to 2003
- Operators who have been proactively inspecting should not be penalized

# Overlap of Baseline and Reassessment Time Line – OPS



## Examples





# Consideration of Previous Inspection Data

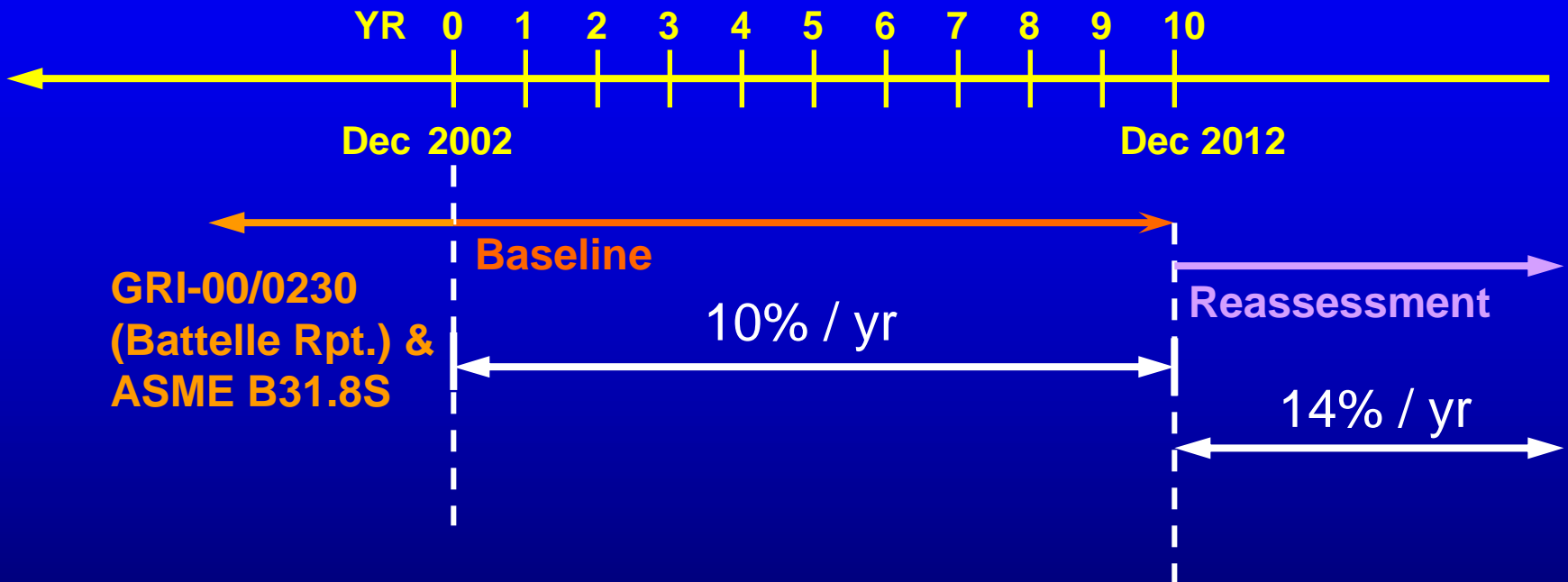
- Reassessment is defined technically by:

- GRI-00/0230 (Battelle Rpt.)
- ASME B31.8S

And is a function of:

- Testing / Repair criteria
  - System protections (effectiveness & modifications)
  - Operating stress level
- The use of Confirmatory Direct Assessment (CDA) during the Baseline Period (2003- 2012) as a reassessment tool and process control verification are technically founded and essential for lines that already have Baseline assessments in accordance with B31.8s

# Use of Previous Inspection Data



# Summary

- Eliminate overlap of “Baseline” and Reassessment to minimize impact on throughput between 2003 – 2012 due to magnitude of “Baseline” effort
- Encourage use of previous inspection data including data from multiple prior inspections irrespective of when it was conducted
  - Use Battelle report and B31.8s in conjunction with CDA during Baseline Period
  - Performance venue should be accessible immediately for those with sufficient data
  - Performance venue access needs clear, technically-based criteria