

## CLOSING REMARKS BY MICHAEL THOMPSON NAPS R CHAIR

To all of the attendees, thank you for taking the time to be here today. Your attendance and participation here today demonstrates to highlight the common goal we all share. That goal being to assure that the gas distribution systems in service and those that are being installed today are, repaired, replaced, maintained and constructed of the highest quality materials and installed by the most skilled and qualified work force available to date. What we have discussed here today demonstrates that there are many common elements for concern between distribution and transmission pipeline construction not the least of which is quality assurance. Without adequate oversight / inspections by company and regulatory inspectors even the best of crews, company or contractor, may simply run amuck resulting in today's installations becoming tomorrows DIMP problem.

Unlike transmission pipeline, over 55% percent of the nation's current natural gas distribution network is made up of plastic pipe. We all realize that tomorrow that number will continue to increase. Without downplaying the role of steel pipeline in gas distribution systems we must be prepared to increase our vigilance of the installation of plastic materials in distribution systems. There is an apparent trend in newly installed plastic distribution systems demonstrating an increased failure rate in the first three years following installation and leveling off afterwards. Today NAPS R members have identified numerous areas where these failures have been occurring. Issues abound with plastic pipeline facility construction and span the entire range from improper storage in the operators' yard to damaging backfill materials used in bedding and shading of the pipeline. Again, as we have noted throughout today's presentations, many of these issues center on the question of quality assurance and proper oversight/inspection.

Distribution Integrity Management regulations have arrived. It must be noted that the integrity of distribution facilities depends on both maintaining the existing facilities and ensuring that new facilities are properly constructed to avoid future integrity issues.

In order to help ensure that the time, effort and discussions put forth by all participants at this workshop do not end with this meetings adjournment today I would like to present on behalf of NAPS R our proposed path forward for dealing with the issues raised today. In front of you, you should have a copy of our proposal for your review.

The educational piece of our recommendation must be two-pronged: First it should be aimed at providing the individual the knowledge and skills to enable him/her to properly carry out the task; Second, it should focus on altering the behavior of an individual, company or contractor, who possesses all the knowledge, skills and ability to successfully perform the task, but because of other factors, chooses to cut corners.

## PATH FORWARD STEPS AS PROPOSED BY NAPSR IN DISTIBUTION CONSTRUCTION

The following action items are not listed in order of importance:

Prty	Action	Action by
	Identify opportunities through different agencies to better educate construction contractor personnel and those persons responsible for the oversight and/or inspection of these personnel.	PHMSA, NAPSR, Operators, Industry Trade Associations, Trade Unions, Manufacturers
	Identify areas and individuals to likely to need behavioral safety training in dealing with construction tasks	Operators, Industry Trade Associations, Trade Unions
	Recommit to the verification of all welding and joining procedures and qualification of welders and joiners per existing regulatory requirements	Contractors, Operators, State Regulators
	Ensure high quality of construction work through: <ul style="list-style-type: none"> <li>• Qualified construction personnel (own &amp; contractor's)</li> <li>• Qualified inspectors</li> <li>• Adequate number of inspectors (establish a ratio of inspectors to crews based on risks, failures and/or use of non-operator personnel).</li> <li>• More frequent random inspection of construction work</li> <li>• Insist that inspectors observe critical aspects of construction at the job site</li> </ul>	Operators, State Regulators
	Ensure the availability of proper construction plans and procedures by way of documents in the field	Operators, Contractors, State Regulators
	Qualification of all construction personnel whose work may affect the integrity of the pipeline, including personnel responsible for: <ul style="list-style-type: none"> <li>• Jeeping, application and/or repair of coating on steel pipe</li> <li>• Bedding, shading and backfill of pipe</li> <li>• Handling the pipe, before and during installation</li> <li>• All directional boring personnel</li> <li>• Installation of mechanical fittings</li> </ul>	Contractors, Operators, State Regulators
	Qualification of all construction inspectors	Operators, Contractors, State Regulators
	Apply OQ rule to new construction	PHMSA

	Adopt ASME B31Q into the pipeline safety regulations	PHMSA
	Address remaining OQ issues identified by the Revived OQ Task group and identify additional regulatory needs, if any	PHMSA, NAPS
	Apply drug alcohol testing requirements to construction personnel performing new construction	PHMSA
	Revise staffing formula to allow more state inspectors on construction job sites	PHMSA