



Responding to the Record

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Statutory requirements

- Respond within 90 days
- Provide timetable of proposed actions
- Provide explanation of any disagreement
- Make publicly available
- Report status annually to Congress



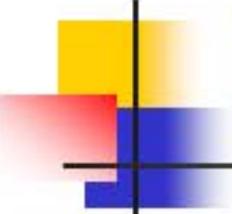
Status of open recommendations

- No independent pipeline safety matters on NTSB “Top 10” list
- Multimodal recommendation on human factors/fatigue on NTSB “Top 10” list
- 15 other open pipeline recommendations



Categories of pending recommendations

- Pipeline technology – 4
- Damage prevention – 2
- Fatigue – 2
- EFV – 1
- Plastic pipe – 1
- Transportation of line pipe – 3
- Emergency response - 2



Under discussion here

- Pipeline technology – Testing relief valves in hazardous liquid pipelines
- Pipeline technology – Designing and constructing gas transmission to control internal corrosion
- EFVs
- Fatigue

Testing relief valves



- Regulations require testing, but don't provide guidance
- NTSB recommended guidance to make sure test is done correctly
- OPS plans Advisory Bulletin to provide guidance



Guidance on testing relief valves

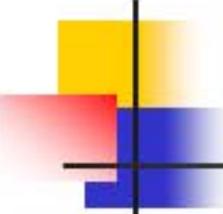
- Operating conditions
- Configuration
- Set pressure
- Testing
- Documentation
- Personnel qualifications

Design and construction

Internal corrosion



- Regulations address internal corrosion control during operation and maintenance, but not at the design and construction stage.
- There is an industry standard.
- NTSB recommended change in regulations.



Why rulemaking?

- Industry standard is detailed, prescriptive, not focused at performance.
- Design and construction standards apply only to new and replaced pipeline, thus limited in scope.
- Will facilitate efforts to address internal corrosion during operation and maintenance. IMP has raised the bar.
- Costs will be minimal.



EFVs

- Available information and alternative approaches to rulemaking to be discussed at public meeting on June 17



Human factors

- Available data and current plans for addressing recommendations is subject of separate discussion before committees