

## Status of NTSB Recommendations

6/25/13

**Enbridge –report date 7/10/12; event date: 7/25/10**

**Summary:** <http://www.nts.gov/investigations/summary/PAR1201.html>

**Full Report:** <http://www.nts.gov/doclib/reports/2012/PAR1201.pdf>

### Recommendations

#### To the Pipeline and Hazardous Materials Safety Administration:

Revise Title 49 *Code of Federal Regulations* 195.452 to clearly state (1) when an engineering assessment of crack defects, including environmentally assisted cracks, must be performed; (2) the acceptable methods for performing these engineering assessments, including the assessment of cracks coinciding with corrosion with a safety factor that considers the uncertainties associated with sizing of crack defects; (3) criteria for determining when a probable crack defect in a pipeline segment must be excavated and time limits for completing those excavations; (4) pressure restriction limits for crack defects that are not excavated by the required date; and (5) acceptable methods for determining crack growth for any cracks allowed to remain in the pipe, including growth caused by fatigue, corrosion fatigue, or stress corrosion cracking as applicable. (P-12-3) **Not initiated.**

Revise Title 49 *Code of Federal Regulations* 195.452(h)(2), the "discovery of condition," to require, in cases where a determination about pipeline threats has not been obtained within 180 days following the date of inspection, that pipeline operators notify the Pipeline and Hazardous Materials Safety Administration and provide an expected date when adequate information will become available. (P-12-4) **Not initiated.**

Conduct a comprehensive inspection of Enbridge Incorporated's integrity management program after it is revised in accordance with Safety Recommendation P-12-11. (P-12-5) **Not initiated.**

Issue an advisory bulletin to all hazardous liquid and natural gas pipeline operators describing the circumstances of the accident in Marshall, Michigan—including the deficiencies observed in Enbridge Incorporated's integrity management program—and ask them to take appropriate action to eliminate similar deficiencies. (P-12-6) **Not initiated.**

Provide additional training to first responders to ensure that they (1) are aware of the best response practices and the potential consequences of oil releases and (2) receive practical training in the use of appropriate oil-containment and -recovery methods for all potential environmental conditions in the response zones. (P-12-14) **Not initiated.**

Review and update your oil pipeline emergency response procedures and equipment resources to ensure that appropriate containment equipment and methods are available to respond to all environments and at all locations along the pipeline to minimize the spread of oil from a pipeline rupture. (P-12-15) **Not initiated.**

Update your facility response plan to identify adequate resources to respond to and mitigate a worst-case discharge for all weather conditions and for all your pipeline locations before the required resubmittal in 2015. (P-12-16) **Not initiated.**

**San Bruno** Report date: 8/30/11      Event date: 9/9/10

Summary: <http://www.nts.gov/investigations/summary/PAR1101.html>

Full Report: <http://www.nts.gov/doclib/reports/2011/PAR1101.pdf>

Recommendations to PHMSA

Require operators of natural gas transmission and distribution pipelines and hazardous liquid pipelines to provide system-specific information about their pipeline systems to the emergency response agencies of the communities and jurisdictions in which those pipelines are located. This information should include pipe diameter, operating pressure, product transported, and potential impact radius. (P-11-8) This recommendation supersedes Safety Recommendation P-11-1. **Issued Advisory Bulletin in the Federal Register. Closed No Longer Applicable (the recommended action has been overtaken by events)\*.**

Require operators of natural gas transmission and distribution pipelines and hazardous liquid pipelines to ensure that their control room operators immediately and directly notify the 911 emergency call center(s) for the communities and jurisdictions in which those pipelines are located when a possible rupture of any pipeline is indicated. (P-11-9) This recommendation supersedes Safety Recommendation P-11-2. **Issued Advisory Bulletin in the Federal Register.**

Require that all operators of natural gas transmission and distribution pipelines equip their supervisory control and data acquisition systems with tools to assist in recognizing and pinpointing the location of leaks, including line breaks; such tools could include a real-time leak detection system and appropriately spaced flow and pressure transmitters along covered transmission lines. (P-11-10) **Not initiated.**

Amend Title 49 *Code of Federal Regulations* 192.935(c) to directly require that automatic shutoff valves or remote control valves in high consequence areas and in class 3 and 4 locations be installed and spaced at intervals that consider the factors listed in that regulation. (P-11-11) **Not initiated.**

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\* This information and wording came from the PHMSA website and the *Transportation Safety Databases* Safety Report.

Amend Title 49 *Code of Federal Regulations* 199.105 and 49 Code of Federal Regulations 199.225 to eliminate operator discretion with regard to testing of covered employees. The revised language should require drug and alcohol testing of each employee whose performance either contributed to the accident or cannot be completely discounted as a contributing factor to the accident. (P-11-12) **Not initiated.**

Issue immediate guidance clarifying the need to conduct postaccident drug and alcohol testing of all potentially involved personnel despite uncertainty about the circumstances of the accident. (P-11-13) **Issued Advisory Bulletin in the Federal Register.**

Amend Title 49 *Code of Federal Regulations* 192.619 to delete the grandfather clause and require that all gas transmission pipelines constructed before 1970 be subjected to a hydrostatic pressure test that incorporates a spike test. (P-11-14) **Not initiated.**

Amend Title 49 *Code of Federal Regulations* Part 192 of the Federal pipeline safety regulations so that manufacturing- and construction-related defects can only be considered stable if a gas pipeline has been subjected to a postconstruction hydrostatic pressure test of at least 1.25 times the maximum allowable operating pressure. (P-11-15) **Not initiated.**

Assist the California Public Utilities Commission in conducting the comprehensive audit recommended in Safety Recommendation P-11-22. (P-11-16) **Not initiated.**

Require that all natural gas transmission pipelines be configured so as to accommodate in-line inspection tools, with priority given to older pipelines. (P-11-17) **Not initiated.**

Revise your integrity management inspection protocol to (1) incorporate a review of meaningful metrics; (2) require auditors to verify that the operator has a procedure in place for ensuring the completeness and accuracy of underlying information; (3) require auditors to review all integrity management performance measures reported to the Pipeline and Hazardous Materials Safety Administration and compare the leak, failure, and incident measures to the operator's risk model; and (4) require setting performance goals for pipeline operators at each audit and follow up on those goals at subsequent audits. (P-11-18) **Not initiated.**

(1) Develop and implement standards for integrity management and other performance-based safety programs that require operators of all types of pipeline systems to regularly assess the effectiveness of their programs using clear and meaningful metrics, and to identify and then correct deficiencies; and (2) make those metrics available in a centralized database. (P-11-19) **Not initiated.**

Work with state public utility commissions to (1) implement oversight programs that employ meaningful metrics to assess the effectiveness of their oversight programs and make those metrics available in a centralized database, and (2) identify and then correct deficiencies in those programs. (P-11-20) **Not initiated.**