



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

APR 26 2006

The Honorable Mark V. Rosenker
Acting Chairman
National Transportation Safety Board
Washington, DC 20594

Dear Mr. Chairman:

This letter provides an interim response to the National Transportation Safety Board's (NTSB) safety recommendations P-05-1 through P-05-5 issued to the Pipeline and Hazardous Materials Safety Administration (PHMSA) on December 23, 2005. The NTSB issued the following recommendations resulting from their study entitled "Supervisory Control and Data Acquisition Systems (SCADA) in Liquid Pipelines," Report No. SS - 05/02, adopted November 29, 2005.

P-05-1: Require operators of hazardous liquid pipelines to follow the American Petroleum Institute's Recommended Practice 1165 [API RP 1165] for the use of graphics on the SCADA screens.

P-05-2: Require pipeline companies to have a policy for the review/audit of alarms.

P-05-3: Require controller training to include simulator or non-computerized simulations for controller recognition of abnormal operating conditions, in particular, leak events.

P-05-4: Change the liquid accident reporting form (PHMSA F 7000-1) and require operators to provide data related to controller fatigue.

Interim response:

PHMSA is monitoring the American Petroleum Institute's (API) completion of the Recommended Practice and API has informed PHMSA of its intention to evaluate the draft Recommended Practice in light of the NTSB recommendations.

PHMSA's Controller Certification (CCERT) Project Team is examining the impact of SCADA graphics on controllers, the impact of alarms on controllers, controller training issues, and the need for data to evaluate controller fatigue.

This week PHMSA intends to announce in the Federal Register a public workshop in June to discuss opportunities to enhance the safety of pipeline control and findings from the CCERT Project. The workshop is a forum to discuss the adequacy of current regulations, some new concepts for improvement of control room management and operations, and for industry to provide feedback on any enhancements PHMSA offers for discussion on the topic. PHMSA would like to hear from the public and industry its experiences related to pipeline management processes, human fatigue issues, controller qualification training and other programs to assure the effective control of pipelines. Among the topics on the agenda will be the following:

- Alarm and event management;
- Shift scheduling and hand-off;
- Current qualification programs; and
- Need to assess knowledge, skills, and abilities such as eyesight and hearing.

The discussion at this workshop will also aid PHMSA in completing the CCERT Project's report and support API's continued work on API RP 1165. This discussion will enable us to provide a more informed response to these recommendations at a later date.

We request the classification of this response to recommendations P-05-1 through P-05-4 as "Open-Acceptable Action."

P-05-5: Require operators to install computer-based leak detection systems on all lines unless engineering analysis determined that such a system is not necessary.

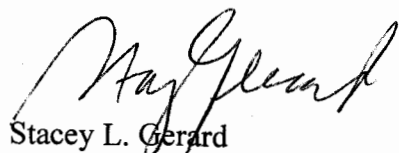
Interim response:

The integrity management rule for hazardous liquid pipelines requires operators to have a means to detect leaks on its pipeline system. To the extent an operator uses a computer-based leak detection system, the operator's system must comply with API Recommended Practice 1130. Forty-six percent of PHMSA's first round of inspections of integrity management programs revealed inadequate use of prevention and mitigation measures, including leak detection, in the program elements. As a result, our second round of inspections will include a more detailed examination of leak detection than the first round. In addition, we will include discussion of mandated use of computer-based leak detection at the public meeting on the CCERT Project this coming summer. This discussion will enable us to provide a more informed response to this recommendation at a later date.

We request the classification of this response to recommendation P-05-5 as "Open-Acceptable Action."

If you have questions, concerns, or comments, please feel free to contact me at (202) 366-4433.

Sincerely,

A handwritten signature in cursive script, appearing to read "Stacey L. Gerard".

Stacey L. Gerard
Acting Associate Administrator/Chief
Safety Officer

cc: Robert Chipkevich, NTSB
Rod Dyck, NTSB