

Alternative Time Frames



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Section 192.1017

§192.1017: When may an operator deviate from required periodic inspections of this part?

§192.1017

- (a) An operator may propose to reduce the frequency of periodic inspections and tests required in this part on the basis of the engineering analysis and risk assessment required by this subpart. Operators may propose reductions only where they can demonstrate that the reduced frequency will not significantly increase risk.

§192.1017

- (b) An operator must submit its proposal to the PHMSA Associate Administrator for Pipeline Safety or the state agency responsible for oversight of the operator's system. PHMSA, or the applicable state oversight agency, may accept the proposal, with or without conditions and limitations, on a showing that the adjusted interval provides a satisfactory level of pipeline safety.

Why Alternate Timeframes

The regulations now require that operators perform these actions at time defined intervals.

This is not risk-based. These regulations may require frequent actions that results in little safety benefit, or may not be done often enough to realize full benefit

Time Defined Regulations

Subpart I

- Part 192.465 CP Testing
Rectifier Inspection
- Part.192.465 Pipelines w/no CP
- Part 192.481 Exposed Pipe
Inspection for Corrosion

Time Defined Regulations

Subpart M

- Part 192.723 Leak Surveys
- Part 192.739 Pressure Limiting Devices Tested
- Part 192.747 Emergency Valves
- Part 192.749 Vault Inspections
- Part 192.721 Main Patrolling

How Operators Can Use This

The resources made available by using alternate intervals, where appropriate, could be used to address more risk-significant threats.

Thus, deviating from set intervals, now specified in sections of Part 192, would allow operators to be more risk-based in the application of their resources.

Regulatory Approval

Operators would be required to submit their proposal, with justification, to jurisdictional safety regulators for review and decision to determine if the proposal will assure an adequate level of pipeline safety.

Performance Data for Request

Operators must provide data demonstrating any timeframe change will not compromise the integrity or safety of the system.

An example could be by providing data that atmospheric corrosion is a low risk to the safety of the system and all exposed piping may be inspected every 4 years instead of every 3 years (Part 192.481).



Time Frame Deviations

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Background



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Phase I Report

“The significant *diversity* among gas distribution pipeline operators ... makes it *impractical to establish prescriptive requirements* that would be appropriate for all circumstances.”¹

¹ Integrity Management for Gas Distribution Pipelines, Report of Phase 1 Investigations, December 2005, p. 1, (emphasis added)





Phase I Report

“It is important that any new requirements that are developed allow sufficient flexibility for the operators of distribution pipeline systems, and the ... regulators who oversee their operations, to **customize** their integrity management efforts to address their **specific systems, threats, and issues**.”¹

¹ Ibid., p. 10 , (emphasis added)



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Provision for Time Frame Deviations



The proposed Distribution IMP regulations are reported to contain a provision for certified **State** agents, or where there is no certified State agent, **PHMSA**, to grant **Time Frame Deviations** from the time-specific operation and maintenance regulations:



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Time Frame Deviations

1. **CP** must be tested once per year. Rectifiers and moving/active components must be inspected six times per year (192.465)
2. Operators must **reevaluate pipelines without CP** every 3 years and provide CP if active corrosion is found (192.465)





Time Frame Deviations

3. Pipe exposed to the *atmosphere* must be inspected for *corrosion* every 3 years (192.481)
 4. *Leak surveys* must be conducted annually in business districts and at least every 5 years (3 if cathodically unprotected and electrical surveys impractical) outside of business districts (192.723)
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Time Frame Deviations

5. **Pressure** limiting devices must be tested at least annually (192.739)
6. Each **valve** necessary for safe system operation must be tested annually (192.747)
7. **Vaults** housing pressure regulating equipment must be inspected annually (192.749)



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Time Frame Deviations

8. Mains must be *patrolled* 4 times a year in business districts and twice per year outside business districts (192.721)



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NAPSR Position



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Local Conditions

Because of the need to customize the Distribution integrity management efforts, Distribution Integrity Management Programs must be tailored to meet the **local conditions** that exist within those distribution systems



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Local System Risks

With the development of the Distribution Integrity Management Program regulations, operators will be evaluating the risks in their *individual, local systems* and developing programs to address those risks



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A & A Activities

It is likely that most operators will be employing **Additional and Accelerated** (A/A) activities ("A/A actions are activities that are performed in addition to the requirements of the Code." ¹)

¹ Draft Guidance Material under development by the Gas Piping Technology Committee for inclusion in the Guide for Gas Transmission and Distribution Piping Systems





A & A Activity Results

These A/A activities should produce **improved safety** and lower the occurrence of significant leaks, failures and incidents. As a result of certain A/A activities, it might be appropriate to **extend the interval** of certain of the time-specific operating and maintenance activities listed above.



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Application

An operator who wishes alternative time frames that extend the interval of the existing regulations must apply to the *governmental organization which has jurisdiction over the safety of the facility*



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Application Content

As part of developing a proposal for such deviation, the operator must *assemble data* which demonstrates:



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Application Content

- a) the *safety benefits* achieved by certain A&A activities, and
- b) how that produces an *equivalent or improved level of safety* for the individual *local system* for which the deviation is being requested





Application Evaluation

Based upon the data specific to the local conditions, the governmental organization with safety jurisdiction would evaluate the request and take those *actions appropriate to the localized situation*



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Duration of Program

The alternative time frame authorized should be **implemented for a specific period**. This should be reviewed periodically, using specific data from the system for which the deviation is granted, to **determine the overall effectiveness of the program**.



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Level of Safety

The net result of any deviation authorization coupled with appropriate A/A actions should produce an ***equivalent or superior level of safety*** compared to the level of safety resulting from direct compliance with all applicable minimum federal safety standards.



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Monitoring

Appropriate **performance measures** need to be identified and monitored to demonstrate the outcome of the Time Frame Deviations



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Modification & Extension

Based on the results demonstrated by the performance measures, the Time Frame Deviation may be modified and/or extended.



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Conclusion

Properly managed, Time Frame Deviations *may* be an appropriate technique to manage the integrity of distribution systems in a cost-effective manner



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