

How Does The NPRM Relate To The GPTC Guidance?



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- The NPRM establishes a high-level, flexible rule.
- Anticipating that the NPRM would be broad based, PHMSA requested the GPTC to develop integrity management approaches in the form of guidance.
- Further detailed guidance is expected to be developed by the GPTC upon issuance of the rule.

Is The GPTC Guidance Material Enforceable As Part of the NRPM?

- No
- The GPTC Guidance is not incorporated by reference in the NPRM.
- The GPTC Guidance is just that – guidance material written in recommendation language.

Why is the GPTC Guidance Important and Relative?

- It gives operators suggested approaches to develop their integrity management program.
- Pipeline safety regulators are given consensus developed reference material to assess operators' programs.
 - State inspectors can use as guidelines, just as operators.
 - State representatives were involved in developing the GPTC Guidance, and expect that following it will result in compliance.
 - If an operator is not following GPTC Guidelines, the operator will be able to explain how its approaches meet the rule.

Can Pipeline Safety Regulators Require Revisions To Operators' Programs?

- Present Part 192 pipeline safety regulations provide for regulators to require operators to amend their plans.
- Paragraph 192.603 (c) states that the pipeline safety regulator can, after notice and opportunity for hearing, require an operator to amend its plans and procedures as necessary to provide a reasonable level of safety.

Can Pipeline Safety Regulators Require Revisions To Operators' Programs?

- Usually plan amendments are resolved without a hearing.
- If a hearing is required, both pipeline safety regulator and operator must argue their case before the hearing officer(s).
- Industry wide practices or guidance such as the GPTC Guidance can be a source of information to support the regulator or operator's arguments.