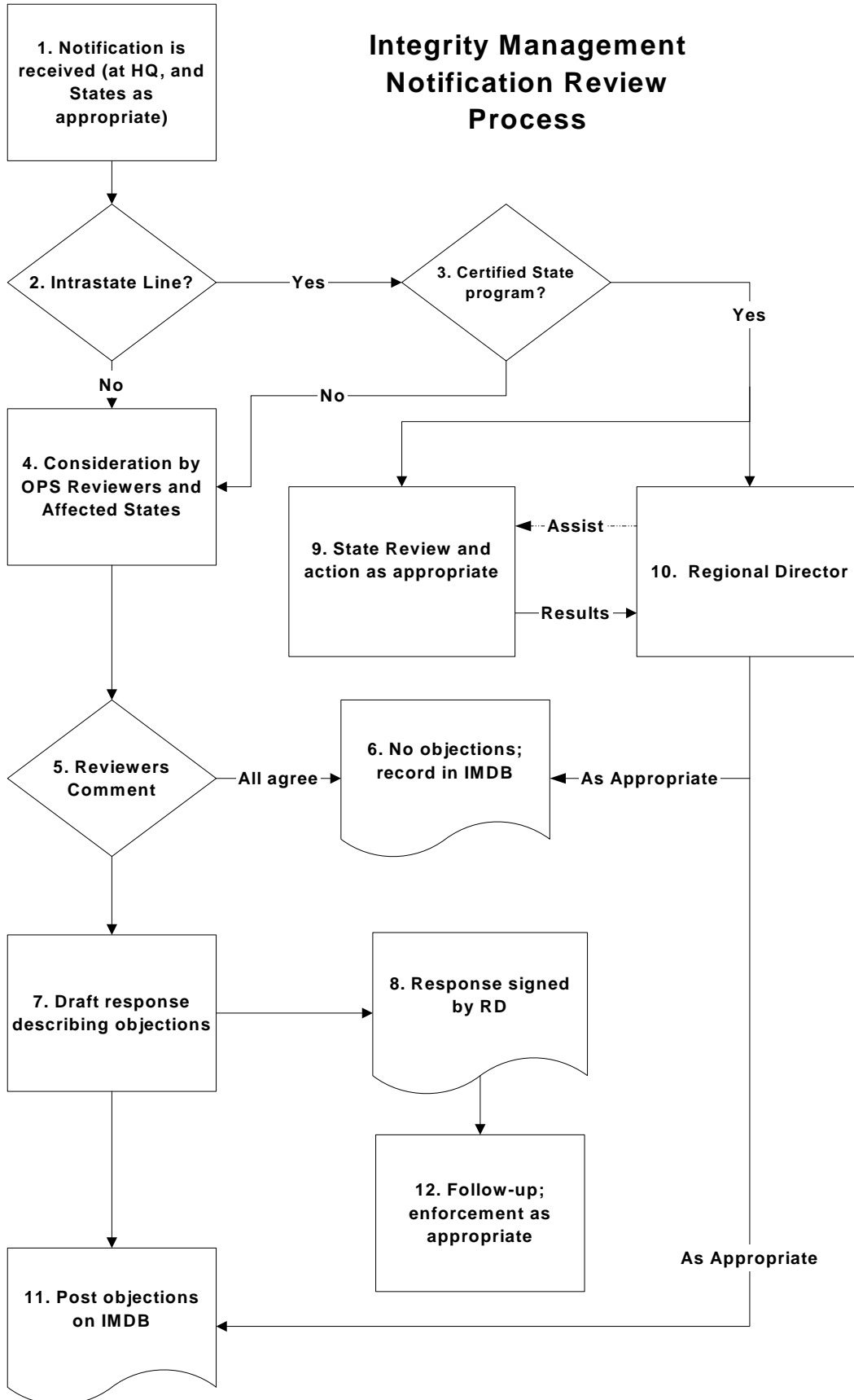


Integrity Management Notification Review Process



Review Process for Gas Transmission Pipeline Integrity Management Notifications

The integrity management rule for gas transmission pipelines allows operators the option of notifying OPS (and states, for intrastate pipelines under their jurisdiction) in two situations where their actions may deviate from the actions specified in the rule:

1. Inability to meet required repair schedules while also unable to provide increased safety by interim pressure reduction
2. Intention to use “other technology” to perform assessments

The rule also requires operators to notify OPS (and states) of significant changes to the operator’s integrity management program.

Notification in these situations affords OPS (and states) the opportunity to review the circumstances to determine whether they create a need for early inspection and possible enforcement action. In making this determination, OPS intends to use the following process (step numbers refer to the numbered boxes on the flow chart):

1. The integrity management rule requires that notifications be submitted to OPS headquarters in writing, by facsimilie, or via the Integrity Management Database (IMDB) (<http://primis.rspa.dot.gov/gasimp/>). Operators are also required to submit notifications for intrastate lines under the jurisdiction of state pipeline safety authorities directly to those authorities.
2. OPS will determine, based on information included in the notification, whether the pipeline segment involved is an intrastate line potentially subject to state jurisdiction.
3. OPS will determine if an intrastate line is located in a state that has a certified pipeline safety program.
4. Notifications concerning interstate pipeline segments (and intrastate pipeline segments in states not having certified programs) will be considered by OPS reviewers. Reviewers will typically include all Regional Directors and subject matter experts as appropriate. Comments will be solicited from states with certified pipeline safety programs regarding notifications concerning interstate pipelines in their state. State program directors will be included as reviewers if the state is an interstate agent.
5. Each OPS reviewer will note whether he/she sees any basis to object to the actions proposed by the operator, indicating a possible need for a special inspection. These comments will be reviewed by OPS headquarters. The process will repeat until agreement is reached.
6. If all reviewers agree there are no objections, the notification status in IMDB will be revised to so state. (This status will also display on the public web site, as described

below). The operator will receive an e-mail informing them of the change in status of their notification.

7. OPS will draft a letter to the operator in instances in which objections are noted, describing the basis for the objections and additional actions the operator can take to reduce the need for a special inspection.
8. The response to the operator, in instances in which objections are noted, will be signed by the appropriate OPS Regional Director or his/her designee. (Letters for notifications involving pipelines in more than one Region may be signed by headquarters management).
9. States with certified pipeline safety programs are responsible for review of notifications concerning intrastate lines under their jurisdiction. These reviews will be conducted by the state using procedures the state finds appropriate to its circumstances. The purpose of the state review, again, will be to determine if the state has technical objections to the alternative actions described in the notification (which may create a need for a special inspection), and to take appropriate action with the operator if such objections are noted. OPS will coordinate with state program officials on these reviews and will provide them information regarding any similar notifications previously reviewed.
10. The cognizant OPS Regional Director will receive copies of notifications under state review. The Regional Director will provide assistance as appropriate. States will inform the Regional Director of the results of their review, including providing copies of any relevant correspondence. The Regional Director will assure these results are recorded in IMDB, as appropriate.
11. The notification status in IMDB will be changed to show that objections have been noted. Objections communicated to an operator will be posted.
12. OPS may follow-up with operators who receive letters informing them of technical objections to their notifications to determine whether the operator plans to change its intended actions. Special inspections will be conducted as needed. Enforcement action will be taken in cases where it is determined that operators are not in compliance with the regulation.

The operator's primary contact (as indicated in the notification record) will receive an e-mail informing him/her each time the status of a notification is changed in the database. When the notification reaches a final status (No Objection, Objections Noted, or Not Required), that contact will also receive the Response Basis statement, which is also recorded in IMDB.

Summary information regarding all notifications will be posted on the Implementing Integrity Management website, (<http://primis.rspa.dot.gov/gasimp/>), available to the general public. This information will include a summary description of the notification,

the review status (under review, no objections, objections noted) and a summary of any objections that have been communicated to the operator.