



Class Location Requirements

Pipeline & Hazardous Materials Safety Administration
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Andy Drake

Spectra Energy



Pipeline Safety Act of 2011 (Section 5(a)(2))

“whether applying integrity management program requirements, or elements thereof, to additional areas would mitigate the need for class location requirements.”

- Concepts clearly demonstrated in risk management projects in mid 90s
- Basis of cost benefit of IM rule.

Key Areas

Class Location Change-outs

New Construction

Class Location Change-outs

- Why change-out good pipe?
- PHMSA cost/benefit decision in December 2003
 - Indicated process was going to be provided for operators as alternative to change-outs
- Special permit process
 - Little certainty in process, requirements continue to escalate
 - Criteria for special permit process has become onerous, essentially eliminating option
 - Revisit with practicable/appropriate criteria
- INGAA agrees in certain situations the pipe should be changed out

“...The improved knowledge of pipeline integrity that will result from implementing this rule will provide a technical basis for providing relief to operators from current requirements to reduce operating stresses in pipelines when population near them increases...with no reduction in public safety.”

Examples of Special Permit Conditions



- Many conditions are already built into existing IM practices and O&M best practices
 - Apply IMP to segment, Hydrotest, CIS, Inline Inspection
 - Remove shielded coating/shrink sleeves, CGA best practices
- Some conditions require modification
 - Applicability to lines with flow reversals
 - Conduct SCCDA along entire special permit inspection area
 - Response to anomalies (FPR)
- Other conditions require open discussion of technical merits in public
 - ACVG or DCVG anomaly response requirements

Providing alternative to constructing by class location



- Provide alternative to existing class location methodology (not eliminating it as option) for new construction
 - Will require deliberate revisiting of entire code
 - Would only apply to new construction going forward
- Construct with one design factor (.72)
 - Different design factor for special areas
- Recognize a more effective way to mitigate risk and understand consequence using the PIR
- Use PIR to drive O&M requirements by defining different levels of activity based on population density
 - All levels include IM principles

Class Location Modification?



INGAA believes modification is required to the current class methodology with respect to class location change-outs and that consideration be given to providing an alternative consequence model for new construction.

Improvements in:

- Integrity Management
- Inspection Technology
- Risk Modeling
- O&M (P&M) Measures
- Extending IM Commitment