

PHMSA AMDT. No. 195-102
RECOMMENDED ACTIVITIES SUMMARY

ADMINISTRATIVE & REPORTING

- Review and update Liquid O&M for applicable regulatory changes; including Annual, SRC and incident reporting.
- Review and update Liquid IMP for applicable regulatory changes.
- Annual reporting for all hazardous liquid pipelines will need to be accounted for and information collected.
- Ensure the safety data sheets for crude and NGLs are current and readily available to provide within 6 hours of reporting to NRC.
- Create and document Management of Change (MOC) for actions taken as a result of this amendment.
- Ensure new compliance deadlines are captured in Compliance Management System (CMS).

GENERAL

- Within 72 hours after a significant weather event or natural disaster inspect pipeline facilities.
- Create training to update stakeholders.
- Update Operations with regulatory and procedural changes.
- Review OQ tasks (contractors and employees) for relevance and technical accuracy, given any procedural changes.
- Review and update all affected forms.
- Adjust workflow and/or processes as necessary dependent on who owns the changes.

LEAK DETECTION

- Newly constructed covered pipelines designed to include leak detection systems beyond HCAs except for offshore gathering and regulated rural gathering pipelines.
 - Review API 1130, Section 4.2 for applicability to existing leak detection systems and consider for any modifications made to enhance leak detection systems.
- Leak detection will need to be reviewed and documented as to what systematic, repeatable methodology is used for every applicable asset.

INTEGRITY MANAGEMENT IN HCA'S

- Confirm data sources can provide the necessary information to make informed decisions (dates of installation, dates of assessments, pipeline facility attributes, mileage, pipe diameter, spatial data, etc.) – QC/QA – and if unknown, how do you ascertain? (Evergreen will provide guidance on this topic in a separate update.)
- Annual informational analysis in order to determine risk factors.
 - Incorporate Overland Spread analysis into plan as new information becomes available
 - Incorporate Geohazards as the new information becomes available
 - Consider HCA analysis annually to ensure no newly identified HCAs
 - Explicit reference to seismicity is added to factors that must be considered
- All pipelines in or that could affect HCAs be capable of accommodating in-line inspection tools within 20 years.
- Require integrity assessments at least once every 10 years outside HCAs.
- Update and/or create IMP assessment deadlines given the timetables where applicable.
- Identify gaps with definitive timelines for closure, given informational analysis and integration of data, knowns and unknowns.
- Assess all applicable pipelines for inclusion into IMP and setting into place deadlines and compliance activities.
- Determine if any underwater hazardous liquid pipelines meet criteria outlined in 195.454 requiring annual ILI assessment. If so, add to Liquid IMP and ILI assessment schedules.