



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

The Administrator

400 Seventh Street, S.W.
Washington, D.C. 20590

APR 23 2002

The Honorable Marion C. Blakey
Chairman
National Transportation Safety Board
490 L'Enfant Plaza East, SW
Washington, DC 20594

Dear Chairman Blakey:

This letter responds to the National Transportation Safety Board's (NTSB) Safety Recommendations P-01-1 and P-01-2, which arise from the investigation of the July 7, 1998, natural gas distribution accident in the South Riding community of Loudoun County, Virginia. The NTSB Safety Recommendations address separation of underground facilities and mandatory installation of excess flow valves:

P-01-1 Require gas utility operators to maintain a specified minimum separation distance, sufficient to protect against both thermal and mechanical damage, between plastic gas service lines and underground electrical facilities whenever they install a new gas service line or perform maintenance on existing lines.

RSPA determined that underground separation between gas and electric service lines should be addressed as part of its damage prevention "best practices" initiative. RSPA has entered into a cooperative agreement with the Common Ground Alliance (CGA) to investigate damage prevention solutions, including development of recommendations for minimum separation distance to protect plastic gas service lines from damage resulting from proximity to other underground facilities (including electrical lines). A CGA team is now investigating the issue, including consideration of the electrical conductor radial separation requirements included in the new edition of the National Electric Safety Code (NESC), which is the safety standard used by electric power companies. An NESC study demonstrated that 12-inch separation is usually adequate.

RSPA will consider the results of the CGA work, review the utility separations rules recently adopted in Virginia, consult with state and local officials, and seek public comments on the underground separation issue. Then, RSPA will determine if changes are necessary in the pipeline safety regulations for vertical and horizontal separations on mains and the extension of separation requirements to gas service lines.

Action Requested: RSPA requests that NTSB Safety Recommendation P-01-1 be classified as "Open - Acceptable Action" while we continue to pursue the actions described above.

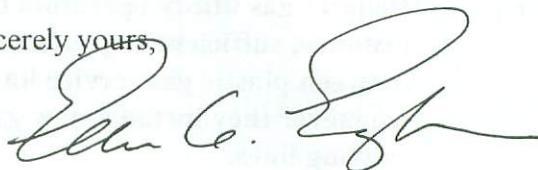
P-01-2 Require that excess flow valves (EFV) be installed in all new and renewed gas service lines, regardless of a customer's classification, when the operating conditions are compatible with readily available valves.

In response to this recommendation, RSPA has enlisted the Volpe National Transportation Systems Center (VNTSC) to provide an analysis of the state of EFV technology, standards, and deployment and to examine current costs and benefits. This report is expected to be completed by summer 2002. Based on this study and after consultation with NTSB, the gas distribution industry, and the public, RSPA will determine if there are circumstances for which it will be beneficial to require mandatory installation of excess flow valves (EFV) on new and renewed gas service lines for residential and commercial customers.

Action Requested: RSPA requests that NTSB Safety Recommendation P-01-2 be classified as "Open - Acceptable Action" while we continue to pursue the actions described above.

If we can be of further assistance, please contact me or Suzanne Te Beau, Associate Administrator for Policy and Congressional Affairs, at (202) 366-4831.

Sincerely yours,



Ellen G. Engleman

cc: Robert Chipkevich, NTSB
Rod Dyck, NTSB