



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

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

RH

September 3, 2004

The Honorable Ellen Engleman Conners
Chairman
National Transportation Safety Board
490 L'Enfant Plaza East, SW
Washington, DC 20594

Dear Chairman Engleman Conners:

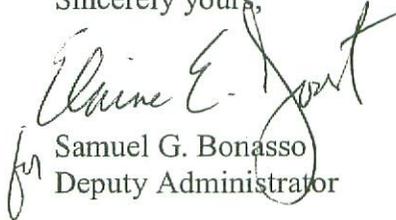
This is the Research and Special Programs Administration's (RSPA) updated response to the National Transportation Safety Board (NTSB) Safety Recommendation P-01-2, which requires that excess flow valves (EFV) be installed in all new and renewed gas service lines. Enclosed is our updated response and a copy of the draft report, "A Benefit/Cost Analysis of the National Transportation Safety Board's Safety Recommendation P-01-2 (September 2003)."

RSPA is considering incorporating requirements for excess flow valves in the upcoming gas distribution pipeline integrity management rule. We have discussed this concept with the National Association of Pipeline Safety Representatives (NAPSR) and the American Gas Association (AGA). The benefit/cost report will be discussed and additional information on the application of EFVs on gas service lines will be solicited at a public meeting scheduled the week of December 13, 2004. We urge NTSB to participate in this public meeting and will continue to keep you informed of our progress.

RSPA requests the NTSB continue to classify the recommendation as "OPEN - Acceptable Action" based on the actions we are taking to resolve this recommendation.

If we can be of further assistance, please contact me or James Wiggins, Director of Policy and Program Support, at (202) 366-4831.

Sincerely yours,


for Samuel G. Bonasso
Deputy Administrator

Enclosures

cc: Robert Chipkevich, NTSB
Rod Dyck, NTSB

**RSPA Updated Response to
NTSB Safety Recommendation
P-01-2**

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.**

Status: **OPEN - Acceptable Response**

Actions: 07/16/01 – RSPA invitation to Common Ground Alliance (CGA) to address excess flow valve issue.
12/00/02 – First draft of Volpe National Transportation Systems Center (VNTSC) report on excess flow valve costs and benefits.
04/23/02 – RSPA response to NTSB recommendation.
03/07/03 – Notice of VNTSC draft report and request for public comments
09/00/03 – Revised draft of VNTSC report on excess flow valve costs and benefits.

Updated Response:

In our initial response, RSPA reported on the retention of the Volpe National Transportation Systems Center (VNTSC) to conduct an analysis of the state of excess flow valve (EFV) technology, standards, and deployment and to examine current costs and benefits. On March 7, 2003, RSPA requested public comment on the draft report. Based on these comments, VNTSC corrected a number of errors in the report and issued a revised draft report, "A Benefit/Cost Analysis of the National Transportation Safety Board's Safety Recommendation P-01-2 (September 2003)." The revised draft report is enclosed and can also be found in Docket RSPA-03-14455 on the DOT dockets management system (<http://dms.dot.gov>). RSPA has briefed the gas pipeline safety advisory committee on the contents of the revised draft report.

RSPA is considering incorporating requirements for EFVs in the upcoming gas distribution pipeline integrity management rule. We have discussed this concept with the National Association of Pipeline Safety Representatives (NAPSR) and the American Gas Association (AGA). The benefit/cost report will be discussed and additional information on the application of EFVs on gas service lines will be solicited at a public meeting scheduled the week of December 13, 2004.

After further consultation with NTSB, NAPSR, the gas distribution industry, and the public, RSPA will determine if there are circumstances for which it would be beneficial to require mandatory installation of EFVs 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.