National Transportation Safety Board

Washington, D.C. 20594

Office of the Vice Chairman

DEC 20 2004

Mr. Samuel G. Bonasso
Deputy Administrator
Research and Special Programs Administration
Washington, D.C. 20590

Dear Mr. Bonasso:

Thank you for your September 23, 2004, letter updating the status of action taken to implement Safety Recommendations P-04-1 through -3, stated below. The National Transportation Safety Board issued these recommendations to the Research and Special Programs Administration (RSPA) on July 1, 2004, as a result of its investigation of the Enbridge pipeline rupture and crude oil release near Cohasset, Minnesota, on July 4, 2002.

P-04-1

> Remove the exemption in 49 *Code of Federal Regulations* [CFR] 192.65(b) that permits pipe to be placed in natural gas service after pressure testing when the pipe can not be verified to have been transported in accordance with the American Petroleum Institute's [API's] recommended practice RP 5L1.

The Safety Board notes that RSPA will publish a notice in the *Federal Register* to seek additional information on the removal of the exemption in 49 CFR 192.65(b). The notice will request public comment on the issues raised by a possible rule to remove the exemption and to determine whether expanded testing of pipe might provide an adequate alternative. RSPA will also review and consider information on vintage pipe and fatigue issues for natural gas transmission lines in reports being prepared by the Interstate Natural Gas Association of America. Because RSPA has initiated action on this issue, Safety Recommendation P-04-1 is classified "Open—Acceptable Response."

P-04-2

> Amend 49 *Code of Federal Regulations* to require that natural gas pipeline operators Part (192) and hazardous liquid pipeline operators (Part 195) follow the American Petroleum Institute's recommended practice RP 5LW for transportation of pipe on marine vessels.

Because RSPA will soon publish a notice to seek information on how incorporation by reference of API's Recommended Practice 5LW for transportation of pipe on marine vessels would impact gas and hazardous liquid pipeline operators, Safety Recommendation P-04-2 is classified "Open—Acceptable Response."

P-04-3

Evaluate the need for a truck transportation standard to prevent damage to pipe, and, if needed, develop the standard and incorporate it in 49 *Code of Federal Regulations* Parts 192 and 195 for both natural gas and hazardous liquid line pipe.

The Safety Board notes that RSPA will conduct a literature search and a comparison of U.S. standards with international standards for truck transportation of pipe, and if the literature search indicates that a standard for truck transportation is warranted, it will approach a standards-developing organization to develop a voluntary consensus standard. Specifically, by early 2005, RSPA will undertake a literature search to identify any problems with truck transportation of pipe, will document quantities of pipe transported by truck, rail, and marine vessels, will document in-service failures of pipe transported by truck, and will evaluate any domestic or international standards addressing this issue. This may be followed by some engineering vibration analysis to assess the risks of truck transportation, either alone or as a part of an overall transport including rail, marine, and truck segments.

The Safety Board appreciates RSPA's plans to conduct a literature search, document failures and quantities of pipe transported by various means, and compare standards. Although a number of previous pipeline failures have been attributed to rail transportation fatigue, the same pipe also was transported in the field by truck. Therefore, the Board believes that an engineering analysis will be required in order to fully evaluate the possibility of fatigue crack initiation during truck transportation. Your letter only indicates that such an analysis may be performed, and that a voluntary consensus standard may be developed. The recommendation asks that a truck transportation standard (if needed) be incorporated into 49 CFR Parts 192 and 195 for both natural gas and hazardous liquid line pipe. This would be consistent with the present regulatory requirements for railroad and marine transportation of pipe. Therefore, the Board requests clarification of RSPA's plans for an engineering analysis and the potential for regulatory action on a pipe standard for truck transportation. Because of the positive actions that RSPA is planning to take, Safety Recommendation P-04-3 is classified "Open—Acceptable Response" pending further clarification.

Thank you for your commitment to pipeline safety.

Sincerely,

Mark V. Rosenker
Vice Chairman

cc: Ms. Linda Lawson, Director
Office of Safety, Energy, and Environment
Office of Transportation Policy