



National Transportation Safety Board

Washington, D.C. 20594

Office of the Chairman

FEB 11 2008

The Honorable Carl T. Johnson
Administrator
Pipeline and Hazardous Materials
Safety Administration
1200 New Jersey Avenue, SE
East Building, 2nd Floor, PH
Washington, D.C. 20590

Dear Mr. Johnson:

Thank you for the July 31, 2007, letter from Ms. Stacey L. Girard, Assistant Administrator/Chief Safety Officer, Pipeline and Hazardous Safety Administration (PHMSA), regarding Safety Recommendation P-98-2, stated below, that was issued to PHMSA on April 30, 1998, as a result of the National Transportation Safety Board's special investigation report, *Brittle-Like Cracking in Plastic Pipe for Gas Service*. The other 12 open pipeline safety recommendations,¹ and the 16 open hazardous materials recommendations,² updated in the PHMSA's July 31, 2007, letter will be addressed in separate correspondence.

P-98-2

Determine the extent of the susceptibility to premature brittle-like cracking of older plastic piping (beyond that piping marketed by Century Utility Products, Inc.) that remains in use for gas service nationwide. Inform gas system operators of the findings and require them to closely monitor performance of the older plastic piping and to identify and replace, in a timely manner, any of the piping that indicates poor performance based on such evaluation factors as installation, operating, and environmental conditions; piping failure characteristics; and leak history.

The Safety Board notes that the Plastic Pipe Database Committee, with representation from government and industry, recently completed collecting 5 years of data for in-service plastic piping material failures and is in the process of documenting the results. The Board further notes that the Gas Distribution Integrity Management Program Report found a need for the American Society for Testing and Materials (ASTM) to consider enhancing performance testing for plastic pipe fittings, and the ASTM is currently addressing these issues. In addition, PHMSA will seek comments on some plastic-pipe issues in its rulemaking regarding the management of gas distribution integrity

¹ P-90-29, P-99-12, P-01-2, P-03-1, P-04-1 through -3, and P-05-1 through -5

² A-99-80, A-99-82, H-92-1, H-98-27, H-02-23 and -24, H-04-23, I-02-1 and -2, R-89-48, R-89-53, R-92-22 and -23, R-01-2 and -3, R-04-10.

management. On September 6, 2007, PHMSA also issued an advisory bulletin that addresses vintage plastic pipes. The Board appreciates the steady progress being made by PHMSA on this recommendation. Accordingly, Safety Recommendation P-98-2 is classified "Open—Acceptable Response," pending completion of the integrity management initiatives.

Thank you for your commitment to pipeline safety. We would appreciate receiving periodic updates on these initiatives as they near completion.

Sincerely,



Mark V. Rosenker
Chairman

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