

May 18, 2010

The Honorable Cynthia L. Quarterman  
Administrator  
Pipeline and Hazardous Materials  
Safety Administration  
Washington, DC 20590

Dear Ms. Quarterman:

Thank you for your January 29, 2010, letter updating the status of Safety Recommendations P-09-1 through -3, stated below. The National Transportation Safety Board (NTSB) issued these recommendations to the Pipeline and Hazardous Materials Safety Administration (PHMSA) on October 27, 2009, as a result of the NTSB's investigation of the November 1, 2007, rupture of a hazardous liquid pipeline with release and ignition of propane at Carmichael, Mississippi.

P-09-1

Conduct a comprehensive study to identify actions that can be implemented by pipeline operators to eliminate catastrophic longitudinal seam failures in electric resistance welded pipe (ERW); at a minimum, the study should include assessments of the effectiveness and effects of in-line inspection tools, hydrostatic pressure tests, and spike pressure tests; pipe material strength characteristics and failure mechanisms; the effects of aging on ERW pipelines; operational factors; and data collection and predictive analysis.

P-09-2

Based on the results of the study requested in Safety Recommendation P-09-1, implement the actions needed.

The NTSB is pleased that on November 3, 2009, PHMSA published a solicitation for a comprehensive research project on *Low Frequency ERW Pipeline Failures* in FedBizOps, which includes, but is not limited to, the assessment of current methods to test and detect flaws and a study of failure mechanisms in ERW pipelines. Pending completion of the study, Safety Recommendation P-09-1 is classified "Open—Acceptable Response." Pending implementation of the actions needed from this study, Safety Recommendation P-09-2 is classified "Open—Acceptable Response."

P-09-3

Initiate a program to evaluate pipeline operators' public education programs, including pipeline operators' self-evaluations of the effectiveness of their public education programs. Provide the National Transportation Safety Board with a timeline for implementation and completion of this evaluation.

The NTSB is pleased that, in the second half of 2010, state and federal inspection programs will be expanded to include a review of operator effectiveness evaluations. PHMSA will prepare an advisory bulletin detailing guidance for pipeline safety inspectors and will prioritize inspections based on pipeline mileage by operator and the type of commodity transported. In June 2010, following the initial 4-year implementation cycle, PHMSA will hold a public awareness workshop to (1) review implementation progress, (2) identify what is working and what is not, and (3) identify critical elements of a successful operator public awareness program. PHMSA will remind operators that public awareness regulations require them to show continuous improvement and that performance metrics are critical in assessing the effectiveness of their programs. In addition, PHMSA will reinforce the need for accurate mapping and the development of mailing lists for distribution of public awareness materials, especially in rural locations and in verifying the identification of residents living at elevations lower than, and within 1 mile of, the pipeline. Further, PHMSA will ensure that public awareness programs include provisions for addressing 911 operators.

The NTSB believes that these actions will satisfy Safety Recommendation P-09-3; accordingly, pending their completion, this recommendation is classified "Open—Acceptable Response."

Thank you for your commitment to pipeline safety. We would appreciate receiving periodic updates on these initiatives as progress continues to address Safety Recommendations P-09-1 through -3.

Sincerely,

Original Signed By:

Deborah A.P. Hersman  
Chairman

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