

PHMSA Mega Rule(s) Operator Perspective



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Gas Transmission Mega Rule(s)

- Began its (their?) journey toward regulation as an ANPRM on 8.25.2011 – comments by 1.20.2012
- Requested information and input on broad questions
 - A. Modifying definition of HCA
 - B. Strengthening P&M requirements in HCAs
 - C. Modifying Repair Criteria
 - D. Reqm'ts for collecting, validating, integrating data
 - E. Making risk model requirements more prescriptive
 - F. Applying knowledge gained through IM program

Gas Transmission Mega Rule(s)

- G. Selection and use of assessment methods
- H. Valve spacing & remote/automatic activation
- I. Corrosion control
- J. Longitudinal seam welds
- K. Underground storage requirements
- L. Management of change
- M. Quality management systems
- N. Exemption of pre-regulation facilities
- O. Modifying regulation of gathering lines

Gas Transmission Mega Rule(s)

- Next stage of rulemaking process – publication of the Notice of Proposed Rulemaking on 4.8.2016
- Comments due 7.7.2016
- Over 130 pages in Federal Register
- Cost – benefit analysis required
- Per PHMSA RIA
- Costs - \$597 million present value
- Benefits - \$3.2-3.7 billion p.v.

DEPARTMENT OF TRANSPORTATION

Pipeline and Hazardous Materials
Safety Administration

49 CFR Parts 191 and 192

[Docket No. PHMSA–2011–0023]

RIN 2137–AE72

Pipeline Safety: Safety of Gas
Transmission and Gathering Pipelines

AGENCY: Pipeline and Hazardous
Materials Safety Administration
(PHMSA), Department of Transportation
(DOT).

ACTION: Notice of proposed rulemaking.

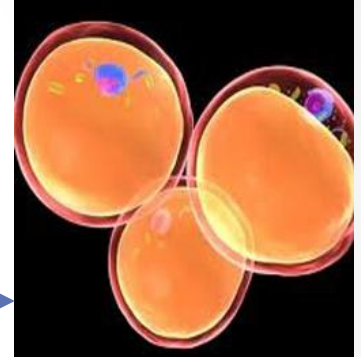
Gas Transmission Mega Rule(s)

Eight specific topic areas noted for analysis

- Re-establish MAOP, verify properties, assess outside HCAs
- IM process clarifications
- MOC process improvement
- Corrosion control
- Pipeline inspection following extreme events
- MAOP exceedance reports & records verification
- Launcher/receiver pressure relief
- Gas gathering regulations

Gas Transmission Mega Rule(s)

- Mega Rule progress has been deliberate
- Voluminous comments to consider
- Split into 3 parts 
- Valves and rupture detection removed to separate rulemaking
- Gathering being considered separately – Part 3
- GPAC met 5 times on transmission sections
- One additional meeting planned for gathering
- Projected Final Rules in 2019



1.1-MAOP Reconfirmation, Expansion of Assessment & Other

- Projected Final Rule – 3/14/2019
- 6-month grace period for 7-year IM reassessment
- Incorporate seismicity into risk analysis
- MAOP exceedance reporting
 - Does not apply to gathering
- Amendments related to §192.619 (MAOP)
 - Probably move 192.619(e) to (a) (Methods 1-6)
 - 192.619(f) records – only onshore steel transmission and required to comply with 619 (a)-(d)
 - Not retroactive

1.2-MAOP Reconfirmation, Expansion of Assessment & Other

- MAOP reconfirmation
 - P-test, P-reduction, ECA, Replace, Small PIR P-reduction, Alt
 - Crack consideration removed from MAOP to IM
 - Remove definition of modern & legacy pipe / constr.
 - Have to address if missing records less than required at time of construction
 - Stress level consideration; < 30% may be ok
 - Complete in 15 years or 4 years after identification
 - Subpart J test – spike for IM, not MAOP
 - Pressure reduction lookback period increased to 5 years
 - Fracture mech. analysis not req'd for pressure reduction
 - Revised FM methods described in new 192.712
 - Method 5 – for PIR < 150 ft

1.3-MAOP Reconfirmation, Expansion of Assessment & Other

- **Non-HCA assessments**
 - DA only as appropriate
 - 14 / 10 years initial assessment / reassessment
 - Clearer differentiation of above or below 30% SMYS
- **MCA definition**
 - Highways - ≥ 4 lanes, travel lanes & shoulders, not ROW
 - Remove occupancy req'mts & tie to HCA-type data
- **Related record provisions**
 - Several areas pulled back to reasonable requirements

1.4-MAOP Reconfirmation, Expansion of Assessment & Other

- **Material verification**
 - Applies to onshore steel transmission only
 - A procedure that may be required by other sections
 - No requirement for an overall program plan
 - Drop list of mandatory attributes
 - Allows operators to develop sampling plan
 - Allows destructive or non-destructive testing
 - Allows single, for-purpose test
 - Drop or reduce accuracy, frequency, quadrant reqm'ts
 - Operator specifies how to deal with failures

2.1-Repair Criteria, IM Improvements, CP, MOC & Other

- Projected Final Rule – 12/20/2019
- Repair criteria – HCA & non-HCA
 - 192.713 not retroactive
 - 192.713 applies to non-Subpart O segments
 - Clarified pressure reductions
 - If SMYS is needed and not known – Gr. A or use 192.607
 - OD & WT – use MAOP basis or 192.607
 - Allow ECA for many types of dents
 - Added response timing for non-HCA dents
 - Some modification and relaxation of response to cracking
 - Clarify “preferential” corrosion metal loss in welds
 - Factors applied to PFP based on class location
 - Longer response time in non-HCA

2.2-Repair Criteria, IM Improvements, CP, MOC & Other

- Inspection following extreme events
 - Period begins after operator determines safety of area
 - Coordinate with local officials
- Safety features on ILL launchers & receivers
 - Relieve pressure and confirm
 - Prevent door opening
 - Implement before use
- Management of change
 - 2-year phase in for non-IM assets
 - For significant changes affecting safety or environment
 - Transmission, not gathering or distribution

2.3-Repair Criteria, IM

Improvements, CP, MOC & Other

- Corrosion control
 - New/replacement pipe coating inspections for > 1000 ft
 - Address severe, not moderate
 - Remedial actions within 1 year
 - Interference surveys – on susceptible lines, remediate if significant within 1 year
 - IC – monitor gas annually where corrodants can enter and other clarifications – applies everywhere

2.4-Repair Criteria, IM Improvements, CP, MOC & Other

- **IM clarifications**
 - All listed measures must be considered, not required
 - ICDA, SCCDA & GWUT essentially as proposed
 - Clarify operators to select appropriate assessment methods
 - DA methods allowed where applicable – no stretching
 - Revised spike – 15 min, lesser of 100% SMYS, 1.5xMAOP
- **Strengthen assessment requirements**
 - Allow various methods besides probabilistic
 - Establish functional requirements
 - 3-year phase-in period

3-Gas Gathering

- Projected Final Rule – 12/20/2019
- Report gathering incidents
- Report gathering annual pipeline data
- Extend safety requirements to Type A gathering in Class 1 locations
- Change certain definitions

Non-Rulemaking (yet)

Reports will be coming out of these activities that will have an impact on implementation of several sections of the rules. Good idea to pay some attention to these.

- Voluntary Information Sharing Working Group
- Pipeline Safety Management Systems (API RP 1173)
- Risk Model Work Group

Web Locations

- **R & D**

<https://primis.phmsa.dot.gov/rd/>

- **Dockets**

<https://www.regulations.gov/>

- **Advisory Bulletins and Notices**

<https://www.phmsa.dot.gov/standards-rulemaking/notices-and-advisory-bulletins>

- **Rulemakings**

<https://www.phmsa.dot.gov/regulations-fr/rulemaking>

- **Public Meetings**

<https://primis.phmsa.dot.gov/meetings/>

- **Regulatory Agenda**

<http://www.reginfo.gov/public/do/eAgendaMain>

- **Monthly Report on Significant Rulemakings**

<https://www.transportation.gov/regulations/report-on-significant-rulemakings>

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Thanks !

