



U.S. Department
of Transportation
**Pipeline and Hazardous Materials
Safety Administration**

Administrator

1200 New Jersey Avenue, SE.
Washington, DC 20590

SEP - 1 2010

The Honorable Deborah A. P. Hersman
Chairman
National Transportation Safety Board
490 L'Enfant Plaza East, SW
Washington, DC 20594

Dear Chairman Hersman:

I am sending you this letter to update you on our status on the National Transportation Safety Board (NTSB) safety recommendations issued after the November 1, 2007 hazardous liquid pipeline rupture near Carmichael, Mississippi. The NTSB issued three safety recommendations to the Pipeline and Hazardous Materials Safety Administration (PHMSA), P-09-1, 2, and 3.

NTSB recommended PHMSA 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) (NTSB Safety Recommendation P-09-1). 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. The NTSB also recommended PHMSA implement actions as needed based on the results of the comprehensive study requested in Safety Recommendation P-09-1 (NTSB Safety Recommendation P-09-2).

In November 2009 PHMSA solicited for a comprehensive study on low frequency Electric Resistance Welded pipe recommended by the NTSB and from technical consensus reached during the 2009 Pipeline R&D Forum. PHMSA received four white papers on that topic, requested proposals from two offerors but only received a proposal from one offeror. Unfortunately that sole offeror was not recommended for award by the diverse Merit Review Panel formed for the solicitation based on the criteria used to evaluate the submissions. PHMSA will try again to solicit for a comprehensive study on low frequency Electric Resistance Welded pipe starting in early FY 2011.

NTSB also recommended PHMSA initiate a program to evaluate pipeline operators' public education programs, including pipeline operators' self-evaluations of the effectiveness of their public education programs, and to provide the NTSB with a timeline for implementation and completion of this evaluation (NTSB Safety Recommendation P-09-3).

PHMSA co-sponsored a public awareness workshop with the National Association of Pipeline Safety Representatives (NAPSR) on June 30, 2010, in Houston, Texas. The workshop provided

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an opportunity for PHMSA and the NAPSRS representatives to hear about the implementation progress and ascertain what is working and not working regarding the use of the RP 1162 for developing, implementing and evaluating public awareness programs as well as jointly identify critical elements of a successful operator public awareness program. Trade associations and pipeline operators shared lessons learned from implementing their public awareness programs based on the RP 1162 and its incorporation by reference into the Federal pipeline safety regulations. The interests of the public were largely represented at the workshop by representatives from the Pipeline Safety Trust. PHMSA and State Partners discussed the timeline for conducting effectiveness evaluations and the plans to use the results from this event in addition to inspection activities to further develop our program for evaluating pipeline operator public awareness programs.

In addition, PHMSA along with our State pipeline partners have formed an ad hoc public awareness team to develop policy and guidance material for upcoming public awareness effectiveness inspections of pipeline operator public awareness programs. The inspections will focus on how operators evaluated their program for effectiveness, what were the results, were results documented, and what improvements were identified and/or implemented. Inspector training and data collection will also be addressed in these plans. Pilot inspections will be conducted to gain more insight and validate the inspection tools and are expected to take place in the first and second quarter of FY 2011.

PHMSA takes the NTSB safety recommendations seriously and works hard to fulfill the requirements of each recommendation. If you have questions, please feel free to contact me at 202-366-4433.

Regards,

A handwritten signature in cursive script, appearing to read "Cindy Quarterman".

Cynthia L. Quarterman