

Reporting



May 14–16, 2013
French Lick, IN

Incident Definition Gas

- ▶ Change the definition of an “incident” in 49 CFR 191.3 to require an operator to report an explosion or fire not intentionally set by the operator and to establish a volumetric basis for reporting unexpected or unintentional gas loss.
 - Incident – event that involves a release of gas AND:
 - A death, or personal injury necessitating in-patient hospitalization;
 - Estimated property damage of \$50,000 or more, including loss to the operator and others, or both, but excluding cost of gas lost;
 - Unintentional estimated gas loss of three million cubic feet or more;

Incident Definition Hazardous Liquid

- ▶ Caused a death or a personal injury requiring hospitalization;
- ▶ Resulted in either a fire or explosion not intentionally set by the operator;
- ▶ Caused estimated property damage, including cost of cleanup and recovery, value of lost product, and damage to the property of the operator or others, or both, exceeding \$50,000;
- ▶ Resulted in pollution of any stream, river, lake, reservoir, or other similar body of water that violated applicable water quality standards, caused a discoloration of the surface of the water or adjoining shoreline, or deposited a sludge or emulsion beneath the surface of the water or upon adjoining shorelines...

“Secondary Ignition”

- ▶ A gas distribution system incident attributed to secondary ignition is to be reported to PHMSA if any fatalities or injuries are involved unless it can be established with reasonable certainty that all of the casualties either preceded the gas distribution system failure or release, or would have occurred whether or not the gas distribution system failure or release occurred.
- ▶ A gas distribution system incident attributed to secondary ignition is NOT to be reported to PHMSA if the only reportable criterion is unintentional loss of gas of 3 million cubic feet or more as described in §191.3 under "Incident" (1)(iii).
- ▶ A gas distribution system incident attributed to secondary ignition is NOT to be reported to PHMSA unless the damage to facilities subject to Parts 191 or 192 equals or exceeds \$50,000.

Telephonic Reporting

- ▶ Affects gas and liquid, 49 CFR 191.5 and 49 CFR 195.52
 - ▶ “Earliest practicable moment...”
 - ▶ ADB-2013-01 (01/30/2013)
 - ▶ Call NRC within one (1) hour of confirmed discovery
 - ▶ Additional telephonic reports as necessary
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Telephonic Reporting (HL)

▶ Calculation

- A pipeline operator must have a written procedure to calculate and provide a reasonable initial estimate of the amount of released product.

▶ New information

- An operator must provide an additional telephonic report to the NRC if significant new information becomes available during the emergency response phase of a reported event at the earliest practicable moment after such additional information becomes known.

Exceedance of MAOP

- ▶ ADB-2012-11 (12/21/2012)
- ▶ Transmission mains
 - Safety Related Condition Report
 - Use 49 CFR 191.25 for guidance
 - Report within five (5) days of occurrence
 - Actions taken prior to report
 - Planned actions, schedule, of corrective action
 - Final rule will allow email
 - Exceptions do not apply report all occurrences

Annual Reports

▶ Distribution

- Leaks – “unintentional escape of gas from the pipeline”
 - Hazardous – immediate repair or continuous action until no longer hazardous
 - “A non-hazardous leak that can be eliminated by lubrication, adjustment, or tightening is not a leak.”
- Excavation tickets, damages
 - Excavation leaks more than excavation damages?
 - PHMSA evaluator is very keen on this.

Leak Causes

- ▶ **CORROSION**
- ▶ **NATURAL FORCES:** leak resulting from earth movements, earthquakes, landslides, subsidence, lightning, heavy rains/floods, washouts, flotation, mudslide, scouring, temperature, frost heave, frozen components, high winds, or similar natural causes.
- ▶ **EXCAVATION DAMAGE**
- ▶ **OTHER OUTSIDE FORCE DAMAGE:** Include leaks caused by fire or explosion and deliberate or willful acts, such as vandalism.
- ▶ **MATERIAL OR WELDS:** leak resulting from failure of original sound material – construction; transportation, manufacturing. Include leaks from material deterioration, other than corrosion.

Leak Causes

- ▶ **EQUIPMENT:** leak resulting from malfunction of control/relief equipment including valves, regulators, or other instrumentation; stripped threads or broken pipe couplings on nipples, valves, or mechanical couplings; or seal failures on gaskets, O-rings, seal/pump packing, or similar leaks.
- ▶ **INCORRECT OPERATIONS:** leaks resulting from inadequate procedures or safety practices, or failure to follow correct procedures, or other operator error.
- ▶ **OTHER:** leak resulting from any other cause, such as exceeding the service life, not attributable to the above causes.

Transmission

- ▶ Merge the natural gas transmission IM Semi-Annual Performance Measures Report with the annual reports, including:
 - Integrity assessments, and actions taken as a result of assessments: ILI, Pressure Testing, Direct Assessments, Other Assessment Techniques
 - Miles of baseline assessments and reassessments
 - Leaks and Failures in HCA's

Transmission, con't.

- ▶ Separate reports and/or sections for commodity and state
 - ▶ Volume of commodity
 - ▶ Types A and B Gathering Line data (Gas)
 - ▶ Miles by percent SMYS and Class Location
 - ▶ Miles of pipe absent sufficient MAOP records
 - ▶ Miles of pipe by pressure test range as a factor of MAOP
 - ▶ Several calculated fields
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