NAPSR – PHMSA Public Workshop on DIMP Implementation

National Association of Pipeline Safety Representatives
Office of Pipeline Safety

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Topic Areas

1. Implementing a DIMP Inspection Program

2. High Level discussion of Inspection Findings

Implementing a DIMP Inspection Program

- State perspective regarding Implementation

- Regulatory Expectations are that a DIMP was developed and implemented by August 2, 2011

- The DIM Plan and Program evolution and maturity

- New and Potential Threats should be incorporated as they are identified

- Risk assessments may need to be performed "off cycle" to address new concerns.

Implementation Experience

- Inspection Experience - Positive feedback from some Operators

- Meaningful insights into DIMP Implementation and solution-oriented comments.

- DIM Plans interact with other required plans (OM&I) to create overall DIM Program

DIMP is a Performance Regulation

- Regulators have commented that performance based language is a challenge to inspect.

- Time must be allowed during inspections for drill downs of data sets to obtain a comprehensive understanding of an operator's system.

- Inspectors are required to use judgment during their inspections in making decisions regarding compliance.

The Big Picture

- An operator should be able to document and discuss:

    – Their Primary Threats,

    – Actions taken to address Primary Threats,

    – Metrics used to measure their performance.
    [Conveniently, this is the last table on the inspection form.]

Insights from DIMP Team

- Operators should trust that they have implemented a sound DIMP, and follow the Plan.

- Communication within the organization of what DIMP means to each individual group is important for its successful implementation.

- Implementation may require a change in culture to put pipeline safety first and change the way business is done.

- The importance and usefulness of DIMP is not always understood - The DIMP is not just another book on the shelf, and resources must be allocated to manage the program.

Common Struggles

- Software enhancements or program augmentation can be required to "canned" programs and existing systems that were originally designed and implemented for specific purposes.

- Identifying measures to reduce risk requires thorough analysis, and tying performance measures to these actions is required.

- Quantifiable Performance Measure implementation criteria is required.

- Baselines must established for performance measures in existence prior to DIMP Implementation

Thank you for Your Participation