

# Feedback to PHMSA proposed Gas Integrity Verification flowchart from liquid pipeline industry perspective

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- In general four comments to flowchart;
  - Positive comments
  - Scope and process questions
  - Missing key details
  - Technical issues

- Three choices to establish / verify MAOP
  - Hydrotest with spike test
  - Derate with life fatigue analysis
  - Engineering Critical Assessment
- Recognizes the fact the hydrotesting is not the only method to assess pipelines
- Documentation focuses on x42 and higher pipe.
- Allows flexibility and an engineering approach

# Scope and Process Questions

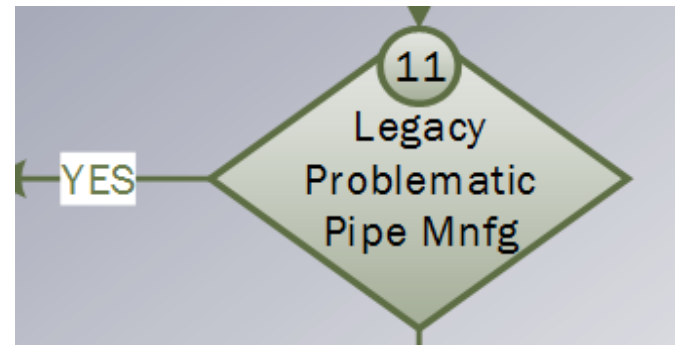
- Is this just to establish MAOP in absence of records verification?
- Does PHMSA want to apply this to broader Integrity Management issues? Would IMP 2.0 include this?
- Will this be a regulatory requirement? If so, what is the intended rulemaking process?
- Does PHMSA want to apply a similar process to liquid pipelines? Through what process?

- Key technical details missing;
  - Document verification requirements
  - Hydrotest requirements
  - Spike test requirements
  - Derating; what level of deration? Based on what operating history?
  - Engineering Assessment requirements

## Clarification of Terms

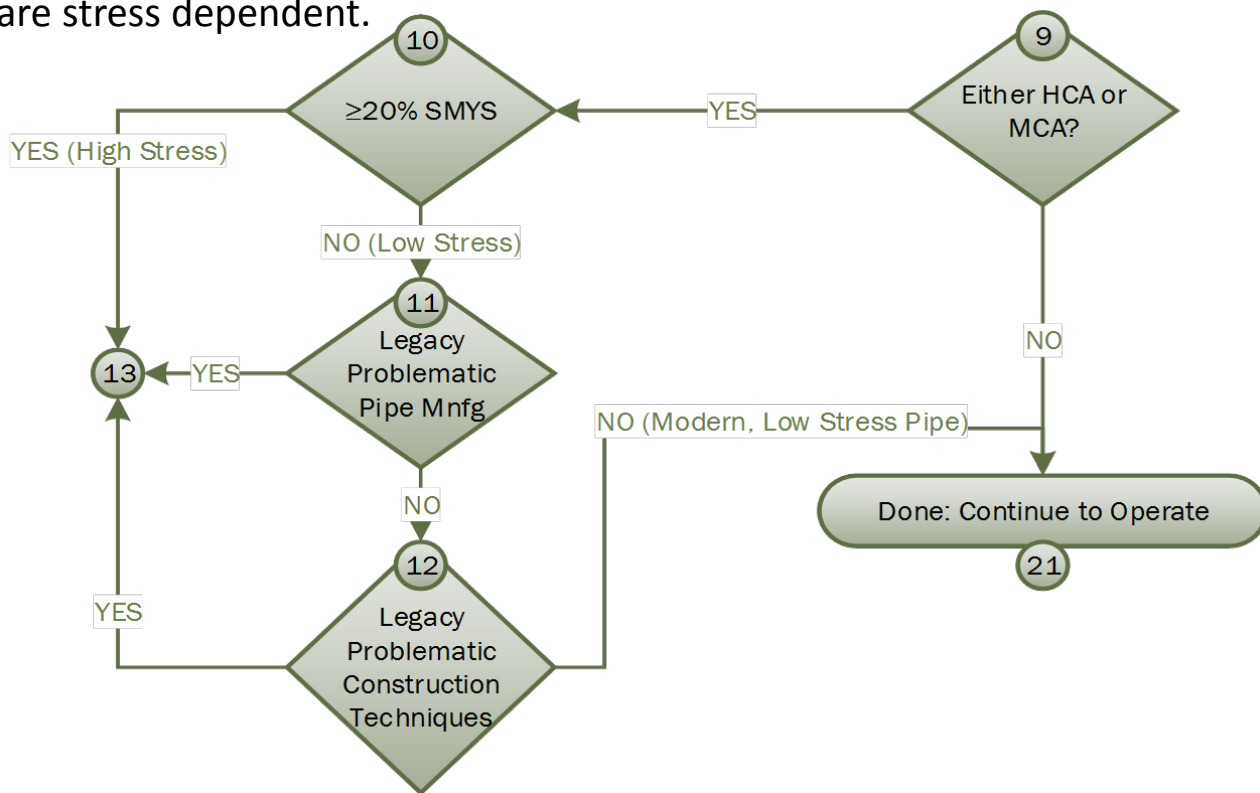
### **FROM PHMSA PRESENTATION**

- **Legacy Pipe** means LFERW, SSAW, Flash Weld (AO Smith), or pipe w/ joint factor < 1 (e.g., lap welded pipe)
- **Modern Pipe** means post-code pipe not manufactured with any techniques listed under Legacy Pipe
- **Legacy Problematic Construction Techniques** means wrinkle bends, miter > 3 degrees, Dresser Couplings, non-standard fittings, arc welds, oxyacetylene welds, bell spigots, puddle weld repairs, etc.
- We need clear definitions of these terms
- What is legacy Problematic pipe?



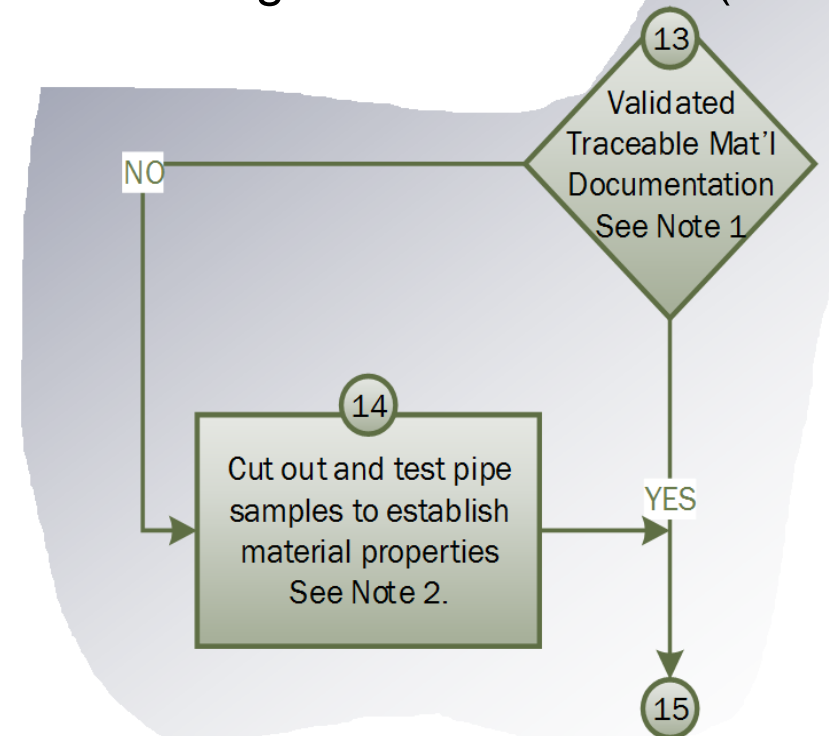
# Technical Comments

- Why emphasis on low stress (<20% SMYS)
- Current code exemptions for low stress lines are different.
- Manufacturing threats are stress dependent.



# Technical Comments

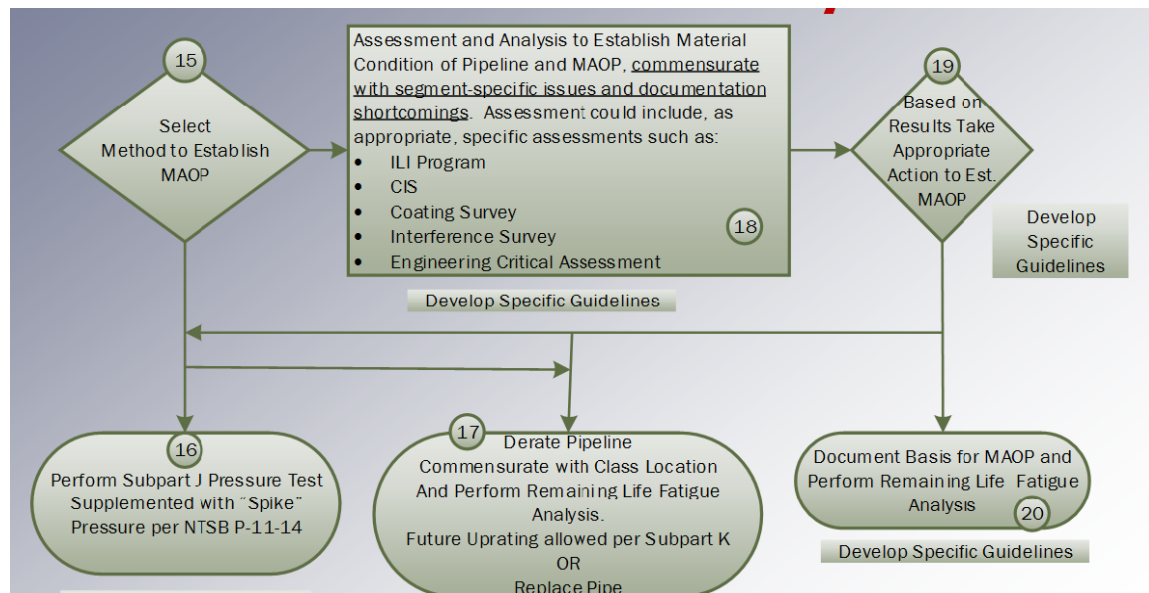
- What is definition of Validated Traceable Material Documentation? Longhorn?
- Why cut out and test requirement in all scenarios?
- May be other less destructive methods to gather same data. (ILI or in-the-ditch testing methods)
- If hydrotest or deration method is chosen, is step ⑭ even relevant?





# Technical Comments

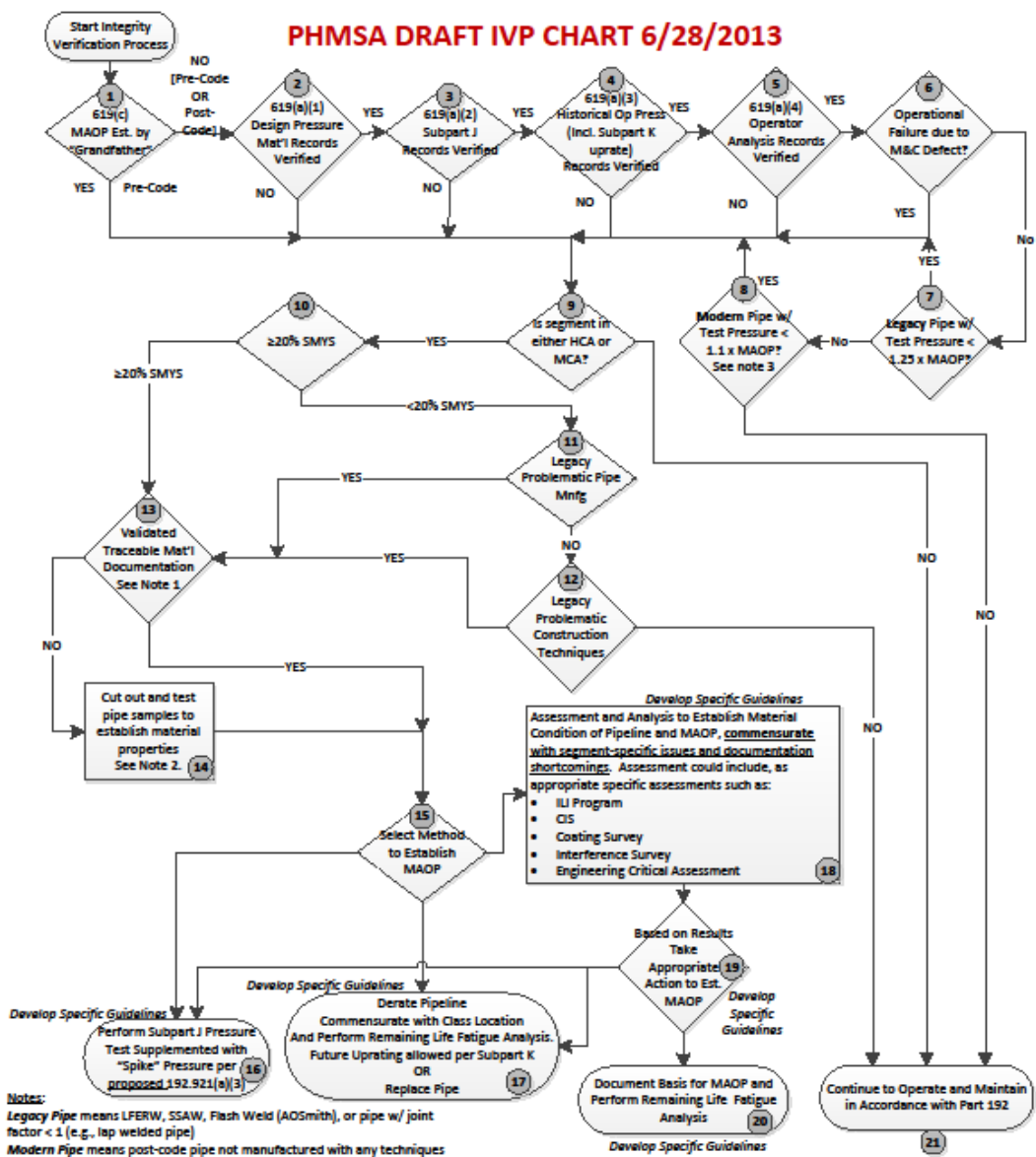
- Subpart J test overly burdensome, other hydrotest methods adequate;
- Use “spike” test only where warranted or appropriate.
- Ensure compliance timeline reflects adequate time for project execution and minimizes service disruption for all assessment methods.
- How are systems expected to operate during documentation and testing periods?





Thank you

# PHMSA DRAFT IVP CHART 6/28/2013



**Notes:**  
 Legacy Pipe means LFERW, SSAW, Flash Weld (AOSmith), or pipe w/ joint factor < 1 (e.g., lap welded pipe)  
 Modern Pipe means post-code pipe not manufactured with any techniques listed under Legacy Pipe  
 Legacy Problematic Construction Techniques means wrinkle bends, miter > 3 degrees, Dresser Couplings, non-standard fittings, arc welds, oxyacetylene welds, bell spigots, puddle weld repairs, etc.  
 Moderate Consequence Area (MCA) means non-HCA pipe in Class 4, 3, 2, locations & Class 1 locations with [TBD] houses/sites in PIR.  
 Note 1: Required for Pipe, Valves, Flanges, Fittings, & Components  
 Note 2: Validated mat'l properties req'd for X42 and greater & pipe ≥ 2"OD if on the mainline.  
 Note 3: Revise 619(a) to require min. 1.25 MAOP pressure test for new pipe  
 Note 4: Validation of MADP per 619(d), Air MADP, not considered a problem and not addressed in FFS requirements

Location	PROPOSED DEADLINES FOR COMPLETING INTEGRITY VERIFICATION					
	≥ 50% SMYS		20 – 50% SMYS		< 20% SMYS	
	Legacy	Modern	Legacy	Modern	Legacy	Modern
HCA	TBD	TBD	TBD	TBD	TBD	TBD
MCA Class 4	TBD	TBD	TBD	TBD	TBD	TBD
MCA Class 3	TBD	TBD	TBD	TBD	TBD	TBD
MCA Class 2	TBD	TBD	TBD	TBD	TBD	TBD
MCA Class 1	TBD	TBD	TBD	TBD	TBD	TBD