## Voting Language for Strengthening IM Assessment Methods Strengthen Standards for ILI - § 192.493

The proposed rule as published in the Federal Register and the Draft Regulatory Evaluation, with regard to the provisions for strengthening standards for inline inspection, are technically feasible, reasonable, cost-effective, and practicable, if the following changes are made:

• Revise proposed § 192.493 by striking the phrase "the requirements and recommendations of" from the paragraph.





#### **Voting Language for Strengthening IM Assessment Methods** Strengthen Standards for Selection of Assessment Method - § 192.921(a)

The proposed rule as published in the Federal Register and the Draft Regulatory Evaluation, with regard to the provisions for strengthening standards for the selection of assessment methods, are technically feasible, reasonable, cost-effective, and practicable, if the following changes are made:

- Revise the language in proposed § 192.921 (a) (1) to clarify that operators select assessment methods based on the threats to which the pipeline is susceptible and remove language in § 192.921(a) that is duplicative with existing § 192.915.
- Revise proposed § 192.921(a) (6) to clarify that direct assessment is allowed where appropriate but may not be used to assess threats for which the method is not suitable.
- Revise proposed § 192.921(a) (7) to incorporate the same "no objection" language the committee approved for § 192.607 and with a timeframe of 90 days. APProved GPAC Language 3 2 18



## **Voting Language for Strengthening IM Assessment Methods** Spike Pressure Test Standard - § 192.506

The proposed rule as published in the Federal Register and the Draft Regulatory Evaluation, with regard to the provisions for the spike pressure test standard, are technically feasible, reasonable, cost-effective, and practicable, if the following changes are made:

- Revise the spike pressure test requirements in proposed § 192.506 to:
  - Change the minimum spike pressure to whichever is lesser: 100% SMYS or 1.5 times MAOP,
  - Approved GPAC Language 3/2/18 Reduce the spike hold time to a minimum of 15 minutes after the spike pressure stabilizes,
  - Revise language to refer to time-dependent cracking,
  - Revise proposed § 192.506(g) to incorporate the same "no objection" language the committee approved for § 192.607 and with a timeframe of 90 days,
  - Revise proposed § 192.506(g)(8) to incorporate "qualified technical subject matter expert" language at the SME requirements.





#### **Voting Language for Assessments Outside of HCAs** MCA Definition - § 192.3

The proposed rule as published in the Federal Register and the Draft Regulatory Evaluation, with regard to the definition of moderate consequence area, are technically feasible, reasonable, cost-effective, and APPROVED GPAC Language 3/2/18 practicable, if the following changes are made:

- Revise the definition of moderate consequence area at § 192.3 by:
  - Changing the highway description to remove reference to "rights-of-way" and adding language so that the highway consists of "any portion of the paved surface, including shoulders,"
  - Clarifying that highways with 4 or more lanes are included,
  - Working with Federal Highway Administration to provide operators with clear information relative to the proposal and discussing in preamble,
  - Discussing in the preamble what the definition of "piggable" is,
  - Modifying the term "occupied sites" in the MCA definition and at § 192.3 by removing "5 or more persons" and the timeframe of 50 days and tying the requirement into the HCA survey for "identified sites" as discussed by members and PHMSA at the meeting. Such identification can be made through publicly available databases and class location surveys. PHMSA will consider the necessary sites and enforceability per direction by the members.





# Voting Language for Assessments Outside of HCAs § 192.710

The proposed rule as published in the Federal Register and the Draft Regulatory Evaluation, with regard to the provisions for assessments outside of high-consequence areas, are technically feasible, reasonable, cost-effective, and practicable, if the following changes are made:

- Clarify § 192.710(c)(6) by stating that direct assessment may be used only if appropriate for the threat being assessed but cannot be used to assess threats for which direct assessment is not suitable,
- Revise the initial assessment and reassessment intervals from 15/20 years to 14/10 years based on a risk-based prioritization,
- Revise proposed § 192.710(a) to apply to lines with MAOP ≥ 30% SMYS, and
- Remove proposed § 192.710(c)(8) dealing with low-stress assessments.







# Voting Language for Records § § 192.13(e), 192.67, 192.127, 192.205, Appendix A

The proposed rule as published in the Federal Register and the Draft Regulatory Evaluation, with regard to the provisions for records, are technically feasible, reasonable, cost-effective, and practicable, if the following changes are made:

- Withdraw the proposed addition of § 192.13(e) and the proposed Appendix A.
- Modify § 192.205 (components) to clarify that it applies to components greater than 2 inches in nominal diameter.
- Revise proposed §§ 192.67 (materials), 192.127 (pipe design), and 192.205 (components) to clarify the effective date of the requirements.

