

human occupancy in identifying pipe segments subject to the requirements associated with class 3 locations. The presence of individual isolated buildings within a sliding mile segment will count to raise the classification of the segment to Class 3. The question is whether the immediate area around the isolated building should be routinely classified as a Class 3 cluster. RSPA/OPS does not believe that these isolated buildings are commonly included as Class 3 clusters and does not intend this proposed rule to result in a change of existing practice in this regard.

The committee questioned whether RSPA/OPS intends to use the HCA definition as the starting point for identifying segments requiring additional integrity assurance measures, and to allow use of the potential impact zone to reduce the length of pipe subject to the IMP Rule. Committee members expressed concern both as to the appearance of leaving out some portions of HCAs and at the costs of including protections for areas which do not pose the same risks to population as other HCAs. With respect to the first point, the proposed rule includes all pipe segments within HCAs in the requirements for integrity management. However, if the segment is within a class 3 or class 4 location, but not within the potential impact zone, that is, the segment is in a moderate risk area, the proposed time for completing the baseline assessment will be extended to 13 years. RSPA/OPS expects that during the next seven to ten years, many companies will choose to make many segments in Class 3 locations piggable in their entirety and new technology will be available to minimize the cost associated with assessing these segments. However, an option RSPA/OPS is considering is to not require any assessment of segments located within a Moderate Risk Area, but, rather, to require enhanced preventive and mitigative measures on these segments. Our premise is that if houses are mostly clustered in one area of a Class 3 rectangle, a pipeline failure in an area beyond the cluster (*i.e.*, in the moderate risk area) may have little, if any, impact on the area with the cluster of homes. RSPA/OPS desires information on this option, and underlying assumptions, along with any cost information related to the proposed rule.

Committee members representing distribution companies expressed concern that they currently treat all their lines as Class 3 or 4 to avoid costly excavation and replacement of pipes when population densities increase. They are concerned that this decision

will require them to perform segment identification for their lines. This would be an unnecessary cost if the distribution company intends to assess all transmission lines they operate. RSPA/OPS intends that operators choosing to classify their entire system as Class 3 or 4 without regard to population density will be allowed to do so without having to do segment identification according the provisions of the rule. However, these operators will not be relieved of requirements to evaluate the risk-based priority of segments in developing assessment schedules.

The committee expressed some concern that the approach being taken in the rule will lead to doubling protections on pipeline segments near population groups, since existing regulations already require lowering pipe stress levels in Class 3 and 4 locations. RSPA/OPS acknowledges this point, but notes that a significant consideration in our decision to allow a longer reassessment interval than that for liquid pipelines is that the thicker/stronger pipe in areas subject to the integrity management rule lengthens the time for time-dependent deterioration mechanisms to cause significant pipe deterioration.

#### **Notice on Integrity Management Concepts and Hypotheses (Gas Transmission Pipelines)**

On June 27, 2001, RSPA/OPS issued a notice of request for comments (66 FR 34318) that stated the objective in developing a rule on gas pipeline integrity management and described the scope and the elements of an eventual gas integrity management rule. We described seven elements that should be included in any integrity rule to fulfill our objectives. We used similar elements to those employed in structuring the liquid integrity management rules. Those seven elements were then elaborated upon through a set of hypotheses that we discussed in detail in the notice. The notice invited comment about these elements and hypotheses.

In addition, the notice summarized the areas where RSPA/OPS was seeking further information to support development of the proposed integrity management program rule for gas operators. The information needs were organized under the seven elements that we saw as essential to any integrity management program rule, and under two other categories where additional information was needed to evaluate the effect of an integrity management rulemaking on costs and gas supply, both seasonally and regionally.

#### **Electronic Discussion Forum**

RSPA/OPS also used an electronic discussion forum from June 27 through August 13, 2001, titled "More Information Needed on Gas Integrity Management Program" to help promote discussion of these issues. The electronic forum listed all the areas where we had asked for comment so that commenters could easily focus on those areas of interest to them. A transcript of the electronic discussion forum is included in the docket.

#### **Comments to Notice on Integrity Management Concepts and Hypotheses (Gas Transmission Pipelines)**

Comments to the docket were provided by one state, five industry associations (including one association of industrial gas consumers), sixteen companies or groups of companies that operate gas pipelines, one company that operates hazardous liquid pipelines, and one company that builds pipeline bridges.

Comments on all elements envisioned for the gas pipeline integrity management concept, except the element defining high consequence areas, are summarized below. Comments on the HCA element are discussed in a separate proposed rule published in the **Federal Register** on January 9, 2002 (67 FR 1108). RSPA/OPS recently finalized the definition of HCAs (67 FR 50824; August 6, 2002).

#### *Scope*

In the notice we indicated that we are considering applying the gas integrity management concept to all gas transmission lines and support equipment, including lines transporting petroleum gas, hydrogen, and other gas products covered under part 192.

The American Gas Association (AGA) and American Public Gas Association (APGA) commented that the integrity rule should apply to gas transmission pipelines operating at or above a hoop stress level of 20% SMYS. These commenters said the rule should also not include pipelines in commercially navigable waterways or environmentally sensitive areas because Congress did not direct this coverage. They also said RSPA/OPS should give special consideration to pipelines operating at a hoop stress between 20% and 30% SMYS. Because these lines fail by leak rather than by rupture, different assurance methods should be considered.

This proposed rule covers gas transmission pipelines, including pipelines transporting petroleum gas, hydrogen, and other gas products