

poses. Operators must complete the baseline assessment within the specified time frame regardless of the stress level at which the pipeline is operating. The plan for conducting the baseline assessment must, among other considerations, minimize the impact on gas supply to residents.

- An operator using pressure test or internal inspection tool assessment method on a segment located in an HCA and in the potential impact zone must complete the baseline assessment within ten years from December 17, 2002 (the date of enactment of the Pipeline Safety Improvement Act of 2002). An operator must assess at least 50% of the line pipe, beginning with the highest risk pipe, by 5 years from December 17, 2002.

- An operator using pressure test or internal inspection tool assessment method within an HCA but outside of the potential impact zone (also known as a moderate risk area) must complete the baseline assessment within 13 years from December 17, 2002 (the date of enactment of the Pipeline Safety Improvement Act of 2002).

- An operator using direct assessment has seven years to complete the baseline assessment and has to assess at least 50% of the line pipe beginning with the highest risk pipe within four years.

- An operator using direct assessment as an assessment method on a pipeline segment located within a moderate risk area (area in a Class 3 or Class 4 location, but not within the potential impact zone), must complete the baseline assessment of the line pipe within 10 years.

The proposed rule specifies the conditions under which direct assessment can be used as a primary assessment tool. The primary reason that the shorter time frame for completing the assessment using the direct assessment process is that the processes are still developmental, and additional information must be gathered on the method's effectiveness so that any needed adjustments can be made. These adjustments will then be reflected in the second assessment process. The seven-year period is based on RSPA/OPS's assessment of the minimum time needed to collect and analyze risk factor data, to develop internal practices and expertise in application of the processes, and to allow the service industry to develop and qualify people needed to responsibly apply the processes. The time frame selected is compatible with that required for completion of baseline assessments in the hazardous liquid pipeline rule. In addition, the riskiest half of the covered

segments have to be assessed during the first four years of the seven-year period.

*Prior assessment.* The proposed rule allows an operator to use an integrity assessment conducted five years previously from December 17, 2002 (the date of enactment of the Pipeline Safety Improvement Act of 2002) as the baseline assessment if the previous integrity assessment method meets the proposed requirements. However, if an operator uses this prior assessment as its baseline assessment, the operator must reassess the line pipe according to the proposed reassessment requirements.

*Newly-identified areas.* When information is available from the information analysis that the population density around a pipeline segment has changed so as to fall within the definition in § 192.761 of a high consequence area, the operator must incorporate the area into its baseline assessment plan as a high consequence area within one year from the date the area is identified. An operator must complete the baseline assessment of any line pipe that could affect the newly-identified high consequence area within 10 years (or 7 years if direct assessment is being used) from the date the area is identified.

*Background on Direct Assessment.* Significant development work was carried out during the past two years to expand the use of indirect assessment tools (e.g., Close Interval Surveys, Direct Current Voltage Gradient, Pipeline Current Mapper, electromagnetic tools) into an integrated integrity assessment process capable of identifying pipeline defects based on a combination of data analysis and integration, above ground assessment, and direct examination. These efforts are resulting in the production of an industry consensus standard on External Corrosion Direct Assessment, and towards the production of standards on direct assessment as applied to internal corrosion and stress corrosion cracking.

RSPA/OPS, along with representatives from several States, participated in the standard development process. This participation led to the identification of several areas where we believe that additional requirements are needed. These additional requirements would help ensure the application of the standards is carried out by competent practitioners, and that innovations developed by more experienced practitioners will be available for use by less experienced operators. Additional requirements could also strengthen those areas where we believe too much discretion is allowed the operator in establishing basic decision criteria

needed to apply the Standards. As additional experience is gained in the use of direct assessment processes, RSPA/OPS can consider relaxing these requirements.

(h) When Can Direct Assessment Be Used and Under What Conditions? Proposed § 192.763(h)

Direct assessment is an integrity assessment method that utilizes a process to evaluate certain threats (*i.e.*, external corrosion, internal corrosion and stress corrosion cracking) to pipeline integrity. The process includes assembly and integration of risk factor data, indirect examination or analysis to identify areas of suspected corrosion, direct examination of the pipeline in these areas, and post assessment evaluation. The process typically makes use of data on the pipeline, its environment and its operating history to determine the significance of potential threats to integrity and to identify indirect assessment techniques (either analytical or above-ground examination) that an operator can use to determine where a threat possibly damaged the pipeline. Once suspect locations are identified and ranked, then direct physical examination determines the extent of damage and the need for mitigative action. Each threat to which direct assessment is applicable uses a somewhat different process to evaluate the presence of the threat.

While the direct assessment process itself is new, operators have used the analytical techniques, above-ground measurement tools, and direct examination technologies that the process employs, for many years. Examples of above-ground techniques with long prior use include close interval surveys (CIS), direct current voltage gradient (DCVG), and pipeline current mapper (PCM). Examples of direct examination techniques with long prior use include direct physical examination, ultrasonic testing, and x-ray examination.

*Why consider allowing the use of direct assessment?* Although in-line inspection (piggings) technologies and pressure testing have been used for years, there are several reasons for allowing direct assessment as an assessment method.

INGAA reports that, at present, 24.4% of its members' transmission pipelines are already piggable. According to INGAA, another 25.3% can easily be made piggable, 45.9% (~82,620 miles) would be very costly to pig and 4.4% (~7,920 miles) cannot be pigged. AGA indicates that 35% of its members' pipelines (~4,725 miles) are not piggable. They could only be made