

installations that are clearly vulnerable to minor impact.

RSPA/OPS said in the NPRM that it expected operators would consider the location of meters and regulators in deciding whether to provide protection from vehicular damage. To insure the final rule reflects this allowance, RSPA/OPS is amending § 192.353(a) to require operators to protect outdoor installations from vehicular damage that may be anticipated. If meters or regulators are installed indoors or installed outdoors in places where anticipating damage from vehicles is not reasonable, no protection is required.

Southwest was concerned that emphasizing vehicular damage would lead to disagreements between government and operators over whether protection is adequate. Nevertheless, such disputes can arise under the present rule, because it requires protection from vehicular damage but does not specify the type or degree of protection. In this situation, operators have discretion to provide whatever type and degree of protection is reasonable under the circumstances. The final rule does not change this discretion. It merely highlights the risk of vehicular damage.

*Section 192.457, External Corrosion Control: Buried or Submerged Pipelines Installed Before August 1, 1971;*

*192.465, External Corrosion Control: Monitoring.* RSPA/OPS proposed to amend § 192.457 by removing from paragraph (b) the requirement to use electrical surveys in determining areas of active corrosion, and by removing paragraph (c). Under § 192.465(e), RSPA/OPS proposed to establish more detailed criteria for alternatives to electrical surveys, and to allow operators to use alternatives on distribution lines without first finding that electrical surveys are impractical. In addition, RSPA/OPS proposed to add definitions of “active corrosion” (the definition now in § 192.457 (c)), “electrical survey,” and “pipeline environment.”

AGA, Peoples, and GPTC commented that moving the definition of “active corrosion” from § 192.457(c) to § 192.465(e) would make § 192.457(b) harder to understand because the term would remain in § 192.457(b). As a remedy, AGA and Peoples suggested adding to § 192.457(b) a cross-reference to the new location of the definition. Peoples also advised making the relocated definition applicable throughout Subpart I rather than just § 192.465(e). GPTC and PSE&G suggested moving the definition to § 192.451, Scope.

Removing § 192.457(c) should not affect § 192.457(b). Under § 192.457(b), the time allowed for initially determining and cathodically protecting areas of active corrosion expired August 1, 1976. And § 192.465(e) regulates all subsequent determinations and protections of areas of active corrosion. So moving the present definition of “active corrosion” from § 192.457(c) to § 192.465(e) simply places the definition where it is currently used. With such limited usage, making the definition applicable throughout Subpart I is not necessary.

As previously stated, RSPA/OPS proposed moving the definition of “active corrosion” from § 192.457(c) to § 192.465(e). However, RSPA/OPS inadvertently included in proposed § 192.465(e) a similar definition of “active corrosion” found in 49 CFR 195.553, which applies to hazardous liquid pipelines. Final § 192.465(e) includes the definition now in § 192.457(c).

The proposed definition of “electrical survey,” which SIRRC recommended, is the same definition that applies to hazardous liquid pipelines under 49 CFR 195.553. The definition is based on pipe-to-soil electrical readings over a pipeline. AGA and NiSource recommended changing “pipe-to-soil” to “potential gradient” to allow the use of “cell-to-cell” surveys, which, AGA said, are typically used on bare pipe to identify corrosion activity. MichCon was similarly concerned that other types of electrical corrosion surveys may not qualify under the proposed definition.

RSPA/OPS agrees that cell-to-cell potential testing would not meet the proposed definition of “electrical survey.” Nevertheless, proposed § 192.465(e) would not preclude operators from using cell-to-cell testing or any other useful method to find active corrosion areas. To find active corrosion without using an electrical survey, operators could use any means that includes review and analysis of certain maintenance records and the pipeline environment. If augmented by this review and analysis, cell-to-cell testing would qualify for use under proposed § 192.465(e). Therefore, RSPA/OPS did not include the commenters’ suggested change in final § 192.465(e).

Southwest thought the term “closely spaced pipe-to-soil readings” was unclear, and suggested deleting “closely spaced.” However, RSPA/OPS believes the term is consistent with usual industry practices. No other commenter suggested the term would be difficult to apply. In addition, the term is part of the “electrical survey” definition in 49 CFR 195.553, which RSPA/OPS adopted

without any objection from industry commenters.

Iowa commented erroneously that proposed § 192.465(e) ignores SIRRC’s central theme that operators should not have to show that electrical surveys are impractical before using alternative review methods. In fact, proposed § 192.465(e) is faithful to SIRRC’s theme. On distribution lines, the proposed rule would allow alternative methods regardless of the practicality of electrical surveys. Only on transmission lines would operators still have to show that electrical surveys are impractical before using alternative methods.

*Section 192.479, Atmospheric Corrosion Control: General.* RSPA/OPS proposed to revise § 192.479 to require the same level of protection from atmospheric corrosion on new and existing pipelines. However, in certain circumstances, operators would not have to protect pipelines from light surface oxide or from atmospheric corrosion that would not affect safe operation before the next scheduled inspection. A similar regulation is now in effect for hazardous liquid pipelines (49 CFR 195.581). In addition, RSPA/OPS proposed to amend the atmospheric corrosion monitoring requirements of § 192.481 to comport with a similar hazardous liquid pipeline regulation (49 CFR 195.583).

GPTC and PSE&G thought proposed § 192.479 would be clearer if the only exception from the protection requirement were pipe without active corrosion. This comment is similar to SIRRC’s suggested change to § 192.479. Our primary reason for not adopting SIRRC’s approach was the advantage to industry and government if similar corrosion control regulations governed gas and hazardous liquid pipelines. Another reason was that the proposed exceptions were consistent with SIRRC’s approach, since the excepted pipelines would not have active corrosion. So, in keeping with the similar-regulations goal, RSPA/OPS has included the proposed exceptions in final § 192.479.

MichCon opposed the proposed exceptions, arguing that operators should stop further corrosion from even a light surface oxide. MichCon also suggested that cleaning and coating are more effective than assessing whether corrosion would affect safety before the next inspection. In contrast, RSPA/OPS continues to agree with SIRRC that a light surface oxide is a non-damaging form of corrosion that does not need remedial action. The absence of any other negative comment on the proposed oxide exception bolsters this position. Also, even if cleaning and