

coating may be a more effective long-term approach, RSPA/OPS believes operators should have the option of assigning resources to problems that pose a higher near-term risk.

MichCon was concerned that inspecting thermally insulated pipe could destroy the insulation system. It suggested making inspections "wherever practical" and sampling pipe through windows cut into the jacketing. MichCon further suggested that the final rule use the term "electrolyte-to-air interface" instead of "soil-to-air interface" to include other pipeline environments. RSPA/OPS believes MichCon has suggested a reasonable way to meet the proposed requirement to inspect thermally insulated pipe for atmospheric corrosion. The rule is designed to allow operators to choose a satisfactory compliance method. RSPA/OPS left "soil-to-air interface" in the final rule because it is one of several specifically-named environments that justify special attention during inspections.

UGI argued that because customer meter sets found inside buildings are generally in non-corrosive environments, the sets do not need inspection for atmospheric corrosion more often than every 5 years. Present § 192.481 calls for inspection at least every 3 years, and RSPA/OPS did not propose to change this interval. Thus, RSPA/OPS did not consider UGI's comment in developing final § 192.481.

AGA suggested RSPA/OPS postpone final action on the proposed revision of § 192.479 until RSPA/OPS addresses issues concerning meters inside buildings and propose other changes to the corrosion control regulations in Part 192. RSPA/OPS has not postponed final action on proposed § 192.479. It is in the interest of pipeline safety overall for RSPA to have similar atmospheric corrosion regulations for gas and hazardous liquid pipelines. Moreover, RSPA/OPS currently has no plans to further revise the Part 192 corrosion control regulations, for RSPA/OPS has closed the previously scheduled revision project (67 FR 74986; Dec. 9, 2002).

*Section 192.517, Records.* RSPA/OPS proposed to amend § 192.517 to require that operators keep records of required leak tests for at least 5 years. The leak tests are those that § 192.509 requires on pipelines designed to operate below 100 psig, that § 192.511 requires on service lines, and that § 192.513 requires on plastic pipelines.

AGA, Iowa, and Peoples asked us to defer final action on proposed § 192.517 until after RSPA/OPS acts on other changes to Part 192 that SIRRC

suggested in a petition for rulemaking dated November 26, 2002. RSPA/OPS has not postponed final action, because RSPA/OPS believes government inspectors need the proposed records now to aid enforcement efforts. More than 10 years ago, NAPS recognized this need in its "Report on Recommendations for Revision of 49 CFR part 192." If RSPA/OPS decides to make additional changes to § 192.517 because of our consideration of SIRRC's petition, RSPA/OPS will include those changes in a future notice of proposed rulemaking.

MichCon and Southwest objected to the proposed rule. It was unclear to MichCon what information operators would have to record, and Southwest mistakenly assumed the information would be the same as § 192.517 requires for strength tests. As RSPA/OPS stated in the NPRM, the purpose of the proposed records is merely to show that required leak tests have been done, not to retain specific information about the tests. The content of the records would be discretionary. A mere notation showing that required tests were carried out would suffice. Section 192.709 requires records of this type for each patrol, survey, inspection, and test done on transmission lines under Subparts L and M of part 192.

Dominion commented that proposed § 192.517 would be very burdensome, pointing to the large number of leak tests done by customers' contractors on customer-owned service lines. It thought that records of these tests would be difficult for operators to obtain. RSPA/OPS thinks Dominion may have mistaken the type of record needed to comply with proposed § 192.517. Proposed § 192.517 would not require operators to obtain copies of records kept by their customers' contractors. No matter who does the testing, its own workers or its customers' contractors, operators would only have to verify that correct leak tests have been done and then record that fact. Under part 192, distribution operators are already responsible for the correct installation and leak testing of customer-owned service lines. Operators who do not install and test customer-owned service lines themselves must still verify that work done by their customers' contractors meets part 192 requirements. So the burden of keeping a record of leak tests done by customers' contractors should be no greater than for leak tests done by operators themselves.

*Section 192.553, General Requirements.* Section 192.553(d) requires that a new maximum allowable operating pressure (MAOP) may not exceed the maximum that part 192

allows on a new segment of pipeline constructed of the same materials in the same location. Based on a SIRRC recommendation, RSPA/OPS proposed to replace the reference to part 192 with a reference to "§§ 192.619 and 192.621," the sections in part 192 that limit the MAOP of new pipelines.

AGA, Iowa, PSE&G, Peoples, and Southwest asked us to defer final action on the proposed change to § 192.553. They suggested RSPA/OPS wait until after RSPA/OPS acts on SIRRC's suggested change to subpart K, Uprating, included in its November 26, 2002, rulemaking petition. That change would allow operators to increase the MAOP of certain existing low stress pipelines without prior pressure testing.

RSPA/OPS has not postponed final action on proposed § 192.553(d) since the proposal involves only a simple editorial change. However, by taking this action RSPA/OPS is not foreclosing the opportunity for future rulemaking based on SIRRC's suggested change to the uprating requirements. If RSPA/OPS decides to make additional changes to § 192.553(d) because of our consideration of SIRRC's recent petition, RSPA/OPS will include those changes in a future notice of proposed rulemaking.

*Section 192.743, Pressure Limiting and Regulating Stations: Testing of Relief Devices.* RSPA/OPS proposed to change § 192.743(a) and (b) to allow operators to use calculations to decide if the capacity of relief devices is adequate without first having to conclude that testing the devices is not feasible. RSPA/OPS also proposed editorial changes to § 192.743(c), which requires installation of new or additional devices if the relief capacity of existing devices is inadequate.

Iowa said RSPA/OPS should change § 192.743(c) to allow operators the option of modifying existing devices or associated facilities to provide the required relief capacity. Although this comment concerns an issue RSPA/OPS did not address in the NPRM, RSPA/OPS did not interpret § 192.743(c) to require the installation of unnecessary relief devices. If operators provide adequate relief capacity by modifying existing relief devices or associated facilities, new or additional devices are not necessary.

*Section 192.745, Valve Maintenance: Transmission Lines.* Section 192.745 requires annual inspection of transmission line valves that operators might need during an emergency. RSPA/OPS proposed to amend this section to require that operators take prompt remedial action to correct any valve found inoperable. Although