

INGAA had presented in its comments. The Committee discussed whether rural buildings, such as rural churches, should be designated as Moderate Risk Areas. Much of the meeting was spent on the industry's petition for reconsideration. The Committee held an extensive discussion on the "identified sites" component of the HCA definition, focusing on places where people congregate and on buildings containing persons of limited mobility. The TPSSC made the following recommendations with respect to the definition of and identification of HCAs:

*Allow a bifurcated option for building count as part of the definition of HCAs.*

RSPA adopted this recommendation into the final rule and modified § 192.903 to allow two methods of identifying HCAs. This is discussed below in section 3 of *Comments to NPRM*.

*Address rural buildings in the same manner as any HCA.*

RSPA has adopted this recommendation by modifying the "identified sites" component of the HCA definition as it relates to outside areas where people gather. The definition now differentiates between outside areas, open structures, and rural buildings, which provide more protection. This is discussed below in *Comments to NPRM*.

*In the HCA definition, substitute "public safety officials, emergency response officials, or local emergency planning committees" for "local officials."*

RSPA accepted this recommendation and modified the "identified sites" component of the high consequence area definition to incorporate this change.

*Define an identified site as any of the following within a Potential Impact Circle:*

1. *A facility housing persons of limited mobility that is known to public safety officials, emergency response officials, or local emergency planning committee, and which meets one of the following three criteria: (a) Is visibly marked, (b) is licensed or registered by a Federal, state, or local agency, or (c) is listed on a map maintained by or available from a Federal, State, or local agency, or*

2. *An outdoor area where people congregate that is known to public safety officials, emergency response officials or local emergency planning committee and which is occupied by 20 or more people on at least 50 days per year, or*

3. *A building occupied by 20 or more people 5 days per week, 10 weeks in any*

*12-month period (the days and weeks need not be consecutive).*

RSPA accepted this recommendation and modified the "identified site" component of the HCA area definition. This revision is consistent with the Class 3 definition of outside area in § 192.5.

The Committee discussed whether the criterion for determining the population density component of a high consequence area should be 10 or 20 buildings intended for human occupancy within the impact circle. The Committee recommended that RSPA/OPS:

*Use 20 buildings intended for human occupancy occurring within a Potential Impact Circle as a criterion for determining high consequence areas.*

RSPA adopted this recommendation and modified the definition of HCA.

The TPSSC discussed whether an additional safety margin should be applied to the Potential Impact Circle radius calculated using the C-FER model and recommended that:

*To define an HCA use the C-FER radius without additional safety margin to define the Potential Impact Circle, and extend by one additional radius on either side of the segment that could potentially impact an HCA.*

RSPA adopted this recommendation and modified the definition of HCA to incorporate this additional length of pipeline.

The TPSSC discussed whether the rule should allow an operator to use data regarding the number of buildings within 660 feet of the pipeline (available now to operators because of the existing definition of Class Locations at § 192.5) to extrapolate the building density in Potential Impact Circles larger than 660 feet, and what the interim period should be for operator to collect the additional data on buildings beyond 660 feet. The Committee voted that the rule should:

*Allow a three-year period for operators to use existing house count data out to 660 feet to infer the number of houses in impact circles exceeding 660 feet in radius.*

RSPA accepted this recommendation and intends to allow operators three years to collect actual data and to revise the HCA to reflect this data.

The Committee discussed what assessment requirements should be applicable to plastic transmission pipelines and recommended that the rule should:

*Allow operators to conduct a reliability analysis as a baseline assessment for plastic pipeline, and require appropriate preventive and mitigative measures.*

RSPA revised the final rule to require additional preventive and mitigative measures for plastic transmission pipelines.

The Committee discussed the assessment methods and intervals that should be required for low-stress pipelines and then voted for RSPA/OPS to:

*Use the approach suggested by AGA as described on pages 6 and 7 of its April 30, 2003 letter, "Amendment to Low-Stress Pipeline Requirements."*

RSPA adopted this recommendation and created a new section in the gas rule (§ 192.941) on low-stress reassessment for pipelines operating below 30% of specified minimum yield strength (SMYS). This recommendation provides for additional analysis focused on third-party damage and increases the frequency of leak surveys as an alternative form of reassessment. This is discussed below in section 7 of *Comments to NPRM*.

The TPSSC discussed whether a requirement to pressure test a pipeline to verify its integrity against material and construction defects be limited to pipeline segments for which information suggests a potential vulnerability. The Committee recommended that RSPA/OPS:

*Incorporate into the rule the concepts of B31.8S pertaining to material and construction defects and increased operating pressure.*

RSPA has incorporated ASME/ANSI B31.8S-2001, *Managing System Integrity of Gas Pipelines*, into the regulation.

The TPSSC discussed the proposed direct assessment requirements and ways to ensure that the method provides an understanding of pipeline integrity comparable to that provided by other assessment methods. In particular the discussion focused on whether it should be allowed as a primary assessment method only to address certain threats, and whether the assessment intervals should be the same as those allowed for the other assessment methods. The TPSSC recommended that the rule:

*Allow direct assessment as a primary assessment method contingent only on applicability to the threats and have assessment intervals the same as those for other methods, subject to clarification on how confirmatory direct assessment fits into the process and relates to the NACE Recommended Practice.*

RSPA/OPS has accepted this recommendation and revised the final rule to allow direct assessment as a primary assessment method for certain threats and to have the same assessment intervals as the other assessment