9 NO-REGRET ACTIVITIES OPERATORS SHOULD BE DOING

DEVELOP A HYDROSTATIC TEST DECISION TREE

It is anticipated that there will be requirements to hydrostatically test in-situ pipelines that have not been tested. Operators may want to develop a decision tree that will allow for the development of a list of 1 through n of pipe sections that are to be tested. Operators can establish their strategy to ensure that the targeted pipe and desired threats are addressed in the decision tree.

DEVELOP AN ISSUES RESOLUTION DECISION TREE

Operators will find that not all of their facilities MAOP of Record are commensurate with the calculated MAOP. Operators may want to consider developing decision trees that incorporate stakeholders review and understanding of issues before specific actions are taken.

DEVELOP PIPELINE AND STATION RECORDS MANAGEMENT SYSTEM

For **existing assets**, perform a records review and ensure that records are:
1. Categorized or Typed (e.g. bill of material, pressure test, etc.)
2. Scanned and attributed (attribution/metadata dictionary should be established for each record category/type)
3. Quality rated
4. Associated with assets

For **new assets**, ensure that there is a process in place to ensure that the above is performed.

DETERMINE CLASS LOCATION PER 49CFR, §192.607

In 1970, this regulation was in effect (it has been removed due to the effective dates having elapsed) to allow operators to perform the necessary activities to be able to operate pipelines one-class-out (aka one-class-back). The established compliance date was July 1, 1973. Operators may want to research for the documentation of this study and subsequent work that was performed.

VERIFY ONE-CLASS-OUT OPERATIONS COMPLIANCE

§192.611 allows for the operation of a pipeline above the allowable % SMYS for the current Class Location. However, in order to invoke this section of code, a class location change must have occurred. Operators may want to validate that, in fact, a class location change did occur in locations where this section of code has been invoked.

PERFORM TRANSMISSION DEFINITION REVIEW

The transmission definition is as follows:

1. Transports gas from a gathering line or storage facility to a distribution center, storage facility, or large volume customer that is not down-stream from a distribution center.
2. Operates at a hoop stress of 20 percent of more of SMYS.
3. Transports gas within a storage field.

Note: Some operators believe that a line must operate at or above the 20% SMYS level in order to be classified as transmission pipe and therefore be subject to rules regarding transmission assets

PERFORM T,V,C DEFINITIONS REVIEW

PHMSA has defined these terms as follows:

Traceable – Traceable records are those which can be clearly linked to original information about a pipeline segment or facility.
Verifiable – Verifiable records are those in which information is confirmed by other complementary, but separate, documentation.
Complete – Complete records are those in which the record is finalized as evidenced by a signature, date or other appropriate marking.

Note: Operators may want to add further clarity to ensure that these terms are embodied and accepted in their operation.

DEVELOP A PROCESS FOR HANDLING UNKNOWN SPECIFICATIONS

Operators will not have records for all of their assets that are in operation. Operators may want to develop a Guide to Conservative Assumptions based on company specific historical purchasing history. In addition, a partner to this Guide is a process for Positive Material Identification (PMI). The PMI process should include a standardized battery of tests.

DEVELOP STRENGTH TEST MULTIPLIER FACTOR TABLES

The multiplier for a Strength Test has changed over time. In addition, some states adopted regulations prior to the federal code or the state regulations are stricter. Operators may want to develop tables that will allow for the use of the appropriate multiplier based on installation dates. The use of the appropriate multiplier will better replicate the MAOP establishment at the time of installation.

GTS
Engineering & Consulting