TVC RECORDS

NOVEMBER 11, 2017
2017 TGA TRANSMISSION ROUNDTABLE
SAN ANTONIO

John A. Jacobi, P.E., J.D
• §192.13(a) No person may operate a segment of pipeline readied for service after [1970 or 1971] unless:

(1) The pipeline has been designed, installed, constructed; initially inspected, and initially tested in accordance with this part; or

(2) The pipeline qualifies for use under this part according to the requirements in §192.14.
REGULATORY REQUIREMENT

• §192.13(b) No person may operate a segment of pipeline . . . that is replaced, relocated, or otherwise changed . . . unless that replacement, relocation, or change has been made in accordance with this part.

• §192.13(c) Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.
ENFORCEMENT GUIDANCE

• O&M Part 192 – 166 pages – updated 7-21-17

• §192.603(b) - Each operator shall keep records necessary to administer the procedures established under §192.605

• §192.619 Maximum allowable operating pressure - Steel or plastic pipelines

• TVC not specifically mentioned in enforcement guidance
INSPECTION PROTOCOL

NONE
Verification of Records

Linda Daugherty – Dep Associate Administrator for Policy and Programs
Alan Mayberry – Dep Associate Administrator for Field Operations
July 12, 2012
What does the ADB Require?

- The ADB information clarifies that adequate records should be:
  - Traceable
  - Verifiable
  - Complete
Traceable

- Traceable records are those which can be clearly linked to original information about a pipeline segment or facility. Examples might include:
  - Pipe mill records, purchase requisition or as-built documentation indicating minimum pipe yield strength, seam type, wall thickness and diameter.
  - Careful attention should be given to records transcribed from original documents. Information from a transcribed record, in many cases, should be verified with complementary or supporting documents.
Verifiable

- Verifiable records are those in which information is confirmed by other complementary, but separate, documentation.

- Two or more complementary records that are positively linked can be used together as a verifiable record.

- A single record which has all needed information does not need a separate, complementary, document.
Complete

• Complete records are those in which the record is finalized as evidence by a signature, date or other appropriate marking.

• Incomplete or partial records are not an adequate basis for establishing MAOP or MOP.

• If records are unknown or unknowable, a more conservative approach is indicated.

(Obviously, records must pass the red-faced test.)
What Does the ADB Advise?

• PHMSA hopes to use data from a revised gas transmission annual report to meet Congressional mandate due 7/2013.
  
  – Act requires PHMSA to direct gas transmission operators to provide verification that their records accurately reflect MAOP of Class 3/4 location and Class 1/2 HCAs
  – Information Collection Activity for revision of gas transmission annual report working through the process.

• PHMSA will later provide guidance on how to bring into compliance those pipelines without verifiable records.
Safety of Gas Transmission and Gathering Pipelines

RIN: 2137-AE72
Docket: PHMSA - 2011 – 0023

Gas Pipeline Advisory Committee Meeting

June 6 - 7, 2017
VOTING LANGUAGE FOR RECORDS

§§ 192.5(d), 192.227(c), 192.285(e), 192.619(f), 192.624(f)

• PHMSA proposed to add the word “reliable” in addition to “traceable, verifiable and complete” wherever records are required.

• New 192.5(d) – PHMSA added a requirement for class location study records (permanent).

• New 192.227(c) & 192.285(e) – PHMSA proposed to require permanent records for welder qualifications & plastic joiner qualifications.
Voting Language for Records
§ § 192.5(d), 192.227(c), 192.285(e), 192.619(f), 192.624(f)

The proposed rule as published in the Federal Register and the Draft Regulatory Evaluation, with regard to the provisions for records, are technically feasible, reasonable, cost-effective, and practicable if the following changes are made:

- Delete the word “reliable” from the records standard to now read “traceable, verifiable and complete” wherever that standard is used.
- In 192.5(d), clarify that documentation be required for the current class location.
- Modify 192.227 (Qualification of welders) and 192.285 (Qualification of persons joining plastic pipe) to include an effective date and change retention period to five years.
July 31, 2012 Letter from PHMSA to AGA

In a June 28, 2012, email to the Pipeline and Hazardous Materials Safety Administration (PHMSA), you stated that members of the American Gas Association (AGA) are seeking clarification of PHMSA’s recent Advisory Bulletin regarding Verification of Records (ADB-12-06, Docket No. PHMSA-2012-0068). AGA’s question is whether a single quality document that contains the information needed to confirm a pipeline’s Maximum Allowable Operating Pressure (MAOP) or Maximum Operating Pressure (MOP) would satisfy the intent of the Advisory Bulletin.

The owner or operator of a pipeline must meet the recordkeeping requirements of Part 192 and Part 195 in support of MAOP and MOP determination. As you stated in your request, operators need to identify appropriate records that establish a high level of confidence regarding the pipeline’s MAOP or MOP, whether that record is a single quality record or information confirmed by other complementary, but separate, documents. Therefore, a single quality document that is traceable and complete, as evidenced by appropriate markings, would be acceptable.
CRITICAL FACTORS

• Design factors (diameter, wall thickness, strength, and seam type)

• Pressure test records

• Pipe, Valves, Flanges, Fittings

MAOP/MOP MUST be established on a segment-by-segment basis.

Do not forget overpressure protection.
CRITICAL FACTORS

• Pre-code systems v. post-code systems
• Consistency
• Acquired systems
• Data gaps
• Start points and end points
• Class Location
RECORDS

• Mill or Material Test Records (MTRs) – the Holy Grail for heat numbers, diameter, wall thickness, strength of steel, seam type, API 5L

• Pipe Tallys – heat numbers, locations, NDE inspections, sequence numbers, signatures, dates, etc.

• Purchase Orders – quantity of pipe, API 5L/ANSI rating, seam type, wall thickness, diameter, strength of steel, coating
§192.517 PRESSURE TEST RECORDS

(1) The operator's name, the name of the operator's employee responsible for making the test, and the name of any test company used.

(2) Test medium used.

(3) Test pressure.

(4) Test duration.
§192.517 PRESSURE TEST RECORDS

(5) Pressure recording charts, or other record of pressure readings.

(6) Elevation variations, whenever significant for the particular test.

(7) Leaks and failures noted and their disposition.
§192.517 PRESSURE TEST RECORDS

Do not forget documentation of test equipment calibration!
QUESTIONS??

John Jacobi
john.jacobi@g2-is.com
(713) 260-4039 (Office)
(832) 712-3098 (Mobile)

Thank YOU!!