



NAPSR

National Association of Pipeline Safety Representatives



NATIONAL ASSOCIATION OF PIPELINE SAFETY REPRESENTATIVES RESOLUTION

NAPSR National Chair
Resolution 2013-1-AC1

Action Category 1

URGING PHMSA TO INCORPORATE NAPSR CONCERNS AND EXPECTATIONS IN DEVELOPING AND DEPLOYING THE INSPECTION ASSISTANT SOFTWARE APPLICATION

WHEREAS: PHMSA has advised the States of its intent to utilize an internal software application known as Inspection Assistant (IA); IA must be utilized by Interstate Agents, and other States may utilize IA or prepare to transfer/bridge data from their local systems to populate IA defined fields; and only data fields required by IA will be captured; and

WHEREAS: Over the years, many state pipeline safety oversight bodies have adopted safety standards that are in addition to or more stringent than federal standards, responding to the state's local knowledge, experience and analysis of data on threats and circumstances unique to that state; and

WHEREAS: Many states have adopted incident, accident, outage, and dig-in reporting requirements, and other indicators of operator performance, that are in addition to and beyond federal requirements, which may lead to enhanced insight into issues facing operators and the need for additional regulatory involvement in their state; and

WHEREAS: Over the years, many state pipeline safety oversight bodies have instituted risk responsive programs, such as more frequent leak surveys or failure-prone pipe replacement, that go beyond the federal code, and are aimed at safety threats rendered apparent by the state's incident history, inspection findings and analysis; and

WHEREAS: The IA inspection system and IA-based database proposed by PHMSA would not include the additional information and experience of the states; and could lead to inaccurate and misleading conclusions regarding the threats, priorities, and operator performance in the states; and

WHEREAS: IA inspection forms and protocols that do not reflect state interests and concerns would result in redundant or duplication of inspection effort, inspection reports and preparation, and record retention as states obtain important additional and state-relevant data not included in the IA system; and

WHEREAS: An incomplete IA database would require that states develop their own potentially partially redundant data bases; and would require duplicate resources to maintain and analyze.

NOW THEREFORE BE IT RESOLVED: That PHMSA is urged to expand the mission of the existing Distribution Form Design Task Group to:

1. Review how best to satisfy the needs of PHMSA's Inspection Assistant initiative while addressing the concerns expressed by the States; preserve and incorporate the information from local data gathering efforts; and minimize redundancies and duplication of efforts;
2. Determine how the IA data collection and database could be structured to best serve the needs of, provide benefits to, and minimize burdens on, all stakeholders; and
3. Define the data points that will be collected and the use of said data points to advance the mission of pipeline safety.