



NATIONAL ASSOCIATION OF PIPELINE SAFETY REPRESENTATIVES RESOLUTION

NAPSR Western Region Resolution 2021-02

A RESOLUTION SEEKING A MODIFICATION OF 49 CFR 192.517 (b) TO REQUIRE CERTAIN DISTRIBUTION PIPELINE PRESSURE TEST INFORMATION BE DOCUMENTED AND TO REQUIRE THE RETENTION OF TEST DOCUMENTATION FOR DISTRIBUTION PIPELINES FOR THE LIFETIME OF THE CORRESPONDING PIPELINE SEGMENT.

WHEREAS: The U.S. Department of Transportation (DOT) - Pipeline and Hazardous Materials Safety Administration (PHMSA) requires pressure tests be conducted following the installation, relocation, or replacement of all jurisdictional gas pipelines to ensure the integrity of the pipeline, to locate and correct potential hazardous leaks, and to establish the maximum allowable operating pressure (MAOP) of the pipeline prior to placing such pipelines into service.

WHEREAS: PHMSA has set forth regulations including specific requirements for the pressure testing and documentation of pressure testing of gas pipelines in Subpart J of 49 CFR 192, beginning with 49 CFR 192.503 through 49 CFR 192.513, prior to placing new or relocated pipelines into service.

WHEREAS: PHMSA has set forth regulations including specific requirements for the pressure test of each disconnected service line before reinstating service lines in Subpart M of 49 CFR 192.725.

WHEREAS: PHMSA has set forth regulations requiring the availability and use of pipeline pressure documentation to establish the maximum allowable operating pressure (MAOP) of pipelines, including short segments of replaced or relocated pipe, prior to placing them in service within Subpart L of 49 CFR 192, specifically 49 CFR 192.619.

WHEREAS: PHMSA has set forth regulations requiring the discovery and repair of each potentially hazardous leak discovered by and during required pressure testing prior to placing a new or relocated pipeline into service within Subpart J of 49 CFR 192, specifically 49 CFR 192.503(a).

WHEREAS: PHMSA has set forth regulations requiring the retention of pressure test documentation and test pressure information for gas pipelines operating at more than 30% SMYS for the jurisdictional life of a pipeline within Subpart J of 49 CFR 192, specifically 49 CFR 192.517(a).

WHEREAS: PHMSA has set forth regulations requiring the retention of pressure test records of pipelines tested under 192.509, 192.511 and 192.513 be retained for a period of a least 5 years with Subpart J of Part 192, specifically 49 CFR 192.517(b).

WHEREAS: PHMSA has set forth regulations in 49 CFR 192.603(b) requiring operators to keep records necessary to administer the procedures established under 49 CFR 192.605, which includes 49 CFR 192.619 and 192.725.

WHEREAS: The regulations requiring operators to keep records, specifically 49 CFR 192.603(b), is potentially in conflict 49 CFR 192.517(b).

THEREFORE, BE IT RESOLVED: That NAPSRS requests PHMSA to:

1) Modify 49 CFR 192.517(b) to require that documentation of each test required by 49 CFR 192.509, 192.511, 192.513, and 192.725 be retained for the useful life of the pipeline, including the test pressure documentation created within the five years prior to the effective date of the rule change.

2) Additionally modify 49 CFR 192.517(b) by requiring the following minimum information be retained:

- Name of operator or operator's contractor responsible for performing the test.
- Pipeline segment pressure tested.
- Test date.
- Employee(s) responsible for making the test.
- Test medium used.
- Test pressure used to establish MAOP.
- Test duration.