

NAPSR PERSPECTIVE ON PROPOSED PUBLIC AWARENESS PROGRAM COMPLIANCE VERIFICATION

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June 30, 2010

NAPSR

National Association of Pipeline Safety Representatives

- **An association of 52 State pipeline safety agencies (2 agencies cover liquids only)**
- **Covers all states + DC & PR, except AK and HI**
- **States have over 325 qualified inspectors**
- **Inspecting 78% of 2.3 million miles of pipelines**
- **On average 5,500 miles / inspector**
- **~ 9,000 operators**

Actions Taken by NAPSRS

- **Have been applying what is in the latest code**
- **Named State participants to the PAP Ad Hoc Team**
- **Worked on workshop preparations with PHMSA**
- **NAPSRS member states on Ad Hoc Team reviewed PHMSA “work in progress” documents**
- **Compiled responses to identify suggestions**

NAPSR Members on Ad Hoc Team

- **Leo Haynos (KS)* – Central Region**
- **Don Ledversis (RI) – Eastern Region**
- **Ron Law (ID) – Western Region**
- **Larry Borum (TN) – Southern Region**
- **James Mergist (LA) – Southwest Region**
- **Mike Smith (NM) – Alternate**
- **David Lykken (WA) -- Alternate**

* Chair of NAPSR team

NAPSR View of API RP1162

- **NAPSR Belief: API RP 1162 is a conceptual document on how to conduct a marketing campaign in pipeline safety**
- **By using RP 1162 as a basis, mandatory guidance can be**
 - **Very thorough and comprehensive**
 - **An attempt to rigidize into requirements abstract subjective judgment issues**
- **RP 1162 gives a general direction but not a clear path**

NAPSR Team Suggestion On PAP Inspection Form & Guidance

- **Start with the form and develop proper questions**
- **Once decided on questions, develop guidance to address the questions**
- **Make sure there is a clear path – i.e. everyone understands the requirements in the work product**

NAPSR Team Suggestions

PAP Inspection form and guidance should:

- 1. Be practical for compliance verification**
- 2. Be not too burdensome to follow**
- 3. Address only requirements, backed by clear requirements in the PAP code**
- 4. Avoid using qualifiers hard to quantify – source of future regulator-regulated contention***
- 5. Minimize requiring written processes – valid processes can vary from operator to operator – source of potential contention as in 4 above***

***Ignoring 4 and 5 risks inconsistencies between state inspectors – may require extensive training**

NAPSR Basic Suggestion

Keep it simple

Suggested Initial Screening Criteria

For each question on inspection form, ask:

- Why is this item needed to verify compliance**
- How much inspector time to verify will this item take**
- If subjective qualifiers must be used, can DIMP rule criteria be applied -- i.e. omitting specifics of requirement or making it flexible**

Applicable Initial Screening Criteria

Should also include but not be limited to:

- Why is a written process description needed (remember the Transmission IMP rule)
- Can a test be devised to just verify the result
- Can terms be precisely defined
- If deviation from intent of API RP 1162 is necessary, can rationale be presented
- Is response from 100% of affected audience (especially John Q. Public) affordable in time and resources

Bottom line: want an effective PAP plan

NAPSR Suggested Path Forward

- 1. Convene PHMSA-NAPSR PAP Ad Hoc Team**
- 2. Agree on ground rules to follow**
- 3. Agree on goals & milestones**
- 4. Develop inspection form then guidance for form**
- 5. Review form and guidance and make adjustments**
- 6. Run pilot inspections to validate form and guidance**
- 7. This workshop can be the kick-off meeting**

Commit to Develop Practical & Effective Product

- **Use consensus process**
- **Leave details to Ad Hoc Team and review group**
- **Consider everyone's input as having equal weight**
- **No room for pride of authorship**
- **Work together every step of the way**
- **When ready for use, hand over to PHMSA**