Baseline and Reassessment Interval
Integrity Management for Gas Pipelines
Proposed Rule
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Overlap of Baseline & Reassessment

- Throughput and Legal issues more than Technical issue
  - Significant impact on system throughput
  - Definitions & intent
  - Battelle Report and ASME B31.8s - technical foundation for reassessment
Overlap of Baseline & Reassessment

- Congress deliberated at great length during drafting of legislation
  - OPS notes from February, 2003 Public Meeting state, Graham Hill believes reassessment begins after completion of baseline.
  - “All pipelines would then be re-inspected every seven years following the 10-year interval.” Press Release following the President signing the Pipeline Safety Improvement Act of 2002, from office of Mr. Tauzin, Chairman of Energy and Commerce.
Overlap of Baseline & Reassessment

- EEA Report & impact on throughput for various Baseline periods and Reassessment intervals
  - Specifically recognized significant effort of Baseline inspections
    - Most extensive outages for facility modifications
    - Most extensive load on service industry as they gear up
    - Most extensive outages for remediation (historical inspection data indicates an order of magnitude more actionable corrosion anomalies on 1st run inspections than on subsequent reassessments)
    - Sequencing of the steps in the preparation and execution yields overlaps - exacerbating Baseline outages
  - Resulting supply interruption and price volatility are exponential
Overlap of Baseline and Reassessment Time Line – OPS

- Baseline: 10% / yr
- Reassessment: 14% / yr
- 20 - 24% per yr
Overlap of Baseline and Reassessment Time Line – Congress

- Baseline: 10% / yr
- Reassessment: 14% / yr
Consideration of Previous Inspection Data

- The “Baseline” implies 1st inspection ever
- Operators have inspection data prior to 2003
- Operators who have been proactively inspecting should not be penalized
Overlap of Baseline and Reassessment Time Line – OPS

- Baseline: 10% / yr
- Reassessment: 20 - 24% per yr
- 14% / yr

Examples

Jan '98 - Dec 2002 - Dec 2012
Consideration of Previous Inspection Data

- Reassessment is defined technically by:
  - GRI-00/0230 (Battelle Rpt.)
  - ASME B31.8S

And is a function of:

- Testing / Repair criteria
- System protections (effectiveness & modifications)
- Operating stress level

- The use of Confirmatory Direct Assessment (CDA) during the Baseline Period (2003-2012) as a reassessment tool and process control verification are technically founded and essential for lines that already have Baseline assessments in accordance with B31.8s
Use of Previous Inspection Data

Dec 2002 - Dec 2012

GRI-00/0230 (Battelle Rpt.) & ASME B31.8S

Baseline

10% / yr

Reassessment

14% / yr
Summary

- Eliminate overlap of “Baseline” and Reassessment to minimize impact on throughput between 2003 – 2012 due to magnitude of “Baseline” effort

- Encourage use of previous inspection data including data from multiple prior inspections irrespective of when it was conducted
  - Use Battelle report and B31.8s in conjunction with CDA during Baseline Period
  - Performance venue should be accessible immediately for those with sufficient data
  - Performance venue access needs clear, technically-based criteria