

Washington State
Citizens Advisory Committee on Pipeline Safety
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February 27, 2003

Dockets Facility
U.S. Department of Transportation
Research and Special Programs Administration
Room PL - 401
400 Seventh Street, Southwest
Washington, D.C. 20590

Subject: Comments on Docket No. RSPA-00-7666: Notice 4

Summary:

I am writing you on behalf of the Washington State Citizens Committee on Pipeline Safety ("WCC"), which I chair. The WCC urges you to extend the time available for interested persons to submit comments on your draft rule relating to integrity management for gas transmission pipelines (RSPA-00-7666; Notice 4). In addition, we believe it is essential that RSPA make available the American Society of Mechanical Engineers (ASME) / American National Standards Institute (ANSI) consensus standard on gas integrity management programs - B31.8S, which is referenced repeatedly in the draft rule.

Discussion:

The importance of this draft rule as well as its scope and complexity warrant more time to comment than the 62 days provided in the Federal Register notice. We believe that a more appropriate comment period would extend until the end of May 2003. At a minimum, please extend the comment period by at least 30 days to April 30, 2003 so that the WCC may offer fully developed comments.

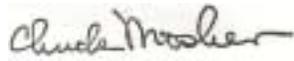
In addition, we are concerned that the ASME / ANSI standard on integrity management (B31.8S) does not seem to be available at no cost. Yet within the draft rule it is referenced as providing guidance for each of the six elements of a complete integrity management program: program evaluation, integrity management, data integration, management of change, quality control and communications. Anyone who wants to comment on this rule must purchase this standard. We urge RSPA/OPS to quickly work with ASME to make this standard available to potential commenters. Without

access to this key element of the draft rule, we are concerned that public comment will be less useful to RSPA/OPS than is needed.

The WCC is made up of thirteen members representing local governments and the public, including four members representing the pipeline industry. The group's charge is to advise state, federal and local government agencies and officials on matters relating to hazardous liquid and natural gas pipeline safety.

Thank you for this opportunity to comment on the proposed rulemaking.

Sincerely,

A handwritten signature in cursive script that reads "Chuck Mosher".

Chuck Mosher

Chairman, Citizens Advisory Committee on Pipeline Safety