

Sara Lyons

From: Kieba, Max (PHMSA) <[REDACTED]>
Sent: Friday, December 15, 2023 1:01 PM
To: Sara Lyons
Subject: RE: PHMSA PSMS Survey - NTSB Safety Recommendation (PLD24FR001)
Attachments: NTSB wording - info collection.docx

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Hi Sara,

Thanks for the opportunity to review. We propose the following wording. There are some nuances in the edits that line up a bit more with the congressional mandate wording. We also tried to steer away from the word completion and use language in 1173. I attached a tracked change version if it helps.

PHMSA recently gathered information through a voluntary information collection request to determine how many gas distribution operators are implementing pipeline safety management systems (PSMS) in accordance with ANSI/API RP 1173.^[1] PHMSA's preliminary results indicate that about 86% of all gas distribution mileage is operated by operators who have begun implementing PSMS voluntarily. Operators who have implemented PSMS in accordance with API 1173 must establish a method to evaluate the maturity of their programs, as the guiding principle of PSMS is continuous improvement.

Max

From: Sara Lyons <[REDACTED]>
Sent: Friday, December 15, 2023 9:28 AM
To: Kieba, Max (PHMSA) <[REDACTED]>
Subject: PHMSA PSMS Survey - NTSB Safety Recommendation (PLD24FR001)

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Good morning, Max,

Based on recent conversations, I understand that PHMSA has completed (but not finalized the results of) a voluntary survey of PSMS operators. I also believe this high-level information is not sensitive/confidential. However, I wanted to give you the opportunity to correct me if my understanding is incorrect. I am proposing this related factual text in one of our reports which will go into formal review on Monday.

PHMSA recently gathered information through a voluntary information collection request to determine how many gas distribution operators are implementing ANSI/API RP 1173.^[1] PHMSA's preliminary results indicate that about 86% of all gas distribution mileage is operated by operators who have begun implementing PSMS voluntarily. Implementation does not signify completion, as the guiding principle of PSMS is continuous improvement.

Thanks,
-Sara