

ANSI Z380 - GAS PIPING TECHNOLOGY COMMITTEE

19-08

PRIMARY: 191.5, GMA G-191-1
 SECONDARY:
 PLACED BEFORE COMMITTEE: March 2019
 RESPONSIBLE GROUP: Editorial Section
 PURPOSE: Review the use of "report" versus "notice" or "notification" in guide material under §191.5 and GMA G-191-1. See TR 17-10.
 ORIGIN/RATIONALE: 2018 - November 12 and 14 – Editorial Section Minutes
 FIRST ACTION: Executive voted accept the TR and assigned to Responsible Group.

This guide material is under review following Amendment 191-25.

- (a) Section 191.5 requires that the initial incident notice must be made as soon as practicable, but no later than one hour after confirmed discovery of the incident as defined in §191.3. Complete information is not necessary for the initial electronic or telephonic incident notice to the National Response Center (NRC). This notice informs other government agencies at the earliest practicable moment without waiting for a definitive evaluation or determination that the event may meet the reporting requirements.
- (b) Refer to Guide Material Appendix G-191-1 for a sample worksheet that may be used to compile information for the initial incident report notice. The initial incident report should be made within 2 hours of discovery of the incident. Initial report The information should include the following.
 (1) - (10) ...
- (c) Section 191.5 states that an operator must confirm or revise the initial telephonic or electronic notice within 48 hours of the initial notice to the extent practicable. Updates may include revisions to the amount of gas released, number of fatalities or injuries, property damage, or other significant facts. The operator should clearly report to notify the NRC that additional information is being provided and give the NRC the initial notice's assigned NRC Report Number. The follow-up notice report may result in an additional NRC Report Number for the operator.
- (d) All related NRC Report Numbers should be referenced in the PHMSA-OPS electronic or written incident report (see §§191.9 and 191.15).
- (e) If an operator determines that an event for which an NRC notice has been made does not meet the definition of an incident, and no 30-day report has been submitted, the operator is encouraged (but not required) to provide notification of that determination to the PHMSA Accident Investigation Division and
to the state pipeline regulatory authority (if the event is investigated by the state). The e-mail address for the Accident Investigation Division is PHMSAAccidentInvestigationDivision@dot.gov.
- (f) If an 30-day incident report has been made as required in §191.9 (Form PHMSA F 7100.1) or §191.15 (Form PHMSA F7100.2) and further investigation reveals that the event was not an "incident," and therefore not reportable, the operator may request that their report be retracted. the report should be nullified with a letter. The Instructions for Form PHMSA F7100.1 and Form PHMSA F7100.2 state that requests are to This letter should be sent to the Information Resources Manager at the address specified in §191.7 within 30 days of the event or emailed to InformationResourcesManager@dot.gov. The letter should reference the NRC incident report number issued when the initial notification was made and briefly explain why the incident report is being nullified. Incident reports cannot be removed from the database, but the letter may help ensure accurate PHMSA-OPS records. The instructions further state that requests are to

include the following.

(1) The Report ID (the unique 8-digit identifier assigned by PHMSA). (2) Operator name.

(3) PHMSA-issued OPID number.

(4) The number assigned by the NRC when an immediate notice was made in accordance with

§191.5. If supplemental notifications reports were made to the NRC for the event, list all report numbers-Report Numbers associated with the event.

(5) Date of the event.

(6) Location of the event.

(7) A brief statement as to why the report should be retracted.

~~(c) Operators should consider making an additional report if there is a significant change in the data previously provided to the NRC. A significant change may include an increase or decrease in the number of injuries or fatalities previously reported, or a revised estimate of property damage that is at least 10 times that previously reported. Consideration should be given to making an additional report up to 48 hours following the initial report. The operator should clearly report to the NRC that additional information is being provided and give the NRC the initial report's assigned NRC Report Number. However, any report following the initial report will result in an additional NRC Report Number being created for the same event. All related NRC Report Numbers should be referenced in the PHMSA OPS electronic or written incident report (see §§191.9 and 191.15).~~

~~(gd) For intrastate pipelines, it is necessary to comply with federal reporting requirements even though an "incident" has been reported to the appropriate state agency.~~

~~(h) The operator should consider providing (even if not required) the appropriate state agency with the same notices, documents and reports and documents that are provided to PHMSA.~~

GMA G-191-1
GUIDE MATERIAL APPENDIX G-191-1
(See guide material under §191.5)
INCIDENT NOTIFICATION WORKSHEET

...
Date, Time and ~~method~~ Method of ~~Report~~ Notification to
National Response Center: _____
(800.424.8802; 202.267.2675 in Washington, D.C.; or electronically
at www.nrc.uscg.mil) NRC Report Number (s) Assigned by NRC:
Name & Phone Number of Person Making
Report Notification to NRC: _____ Operator's 24 hour phone:
Reproduction of this form is permitted.