

TR Number	22-71
Primary Reference	191.25
Secondary Reference	192.933
Purpose	Review and revise GM for 191.25 regarding the definition of “discovery”
Origin/Rationale	Current GM uses a definition from the preamble to Amendment 191-7 to define discovery. However, PHMSA has codified the definition of discovery in 192.933(b). While similar, it probably is better to use the code definition rather than one from a preamble.
Assigned to	DP/ER Task Group

Note: Revisions are shown in yellow highlight and red font.

Section 191.25

- (a) ~~The preamble to Amendment 191-7 (“Interpretation and Statement of Policy Regarding Discovery of Safety-Related Conditions by Smart Pigs and Instructions to Personnel”) states:~~
~~“Discovery of a potentially reportable condition occurs when an operator’s representative has adequate information from which to conclude the probable existence of a reportable condition. An operator would have adequate information for each anomaly that is physically examined. Absent physical examination, discovery may occur after the data are calibrated if the “adequate information” test is met. However, the adequacy of the information that pig data provide about anomalous conditions is contingent on a concurrent indication from a number of factors from which an operator could conclude the probable existence of a reportable condition. Among these are the sophistication of the pig being used, the reliability of the data, the accuracy of data interpretation, and any other factors known by the operator relative to the condition of the pipeline.”~~
- (a) Discovery of condition is defined in §192.933(b). Operators should define the terms for conditions which might be encountered.
- (1) “Discovery” might occur during the course of routine activities such as patrols, leak surveys, leak repairs, and integrity assessments.
- (2) “Determination” might not be concluded until further analysis and calculations are performed such as imposed stresses on exposed pipe or remaining wall thickness is verified.
- (3) Section 192.933(b) includes expectations for discovery associated with integrity assessments.
- (b) See Guide Material Appendix G-191-4 for a form useful for reporting a safety-related condition.
- (c) Additional state requirements may exist for intrastate facilities.