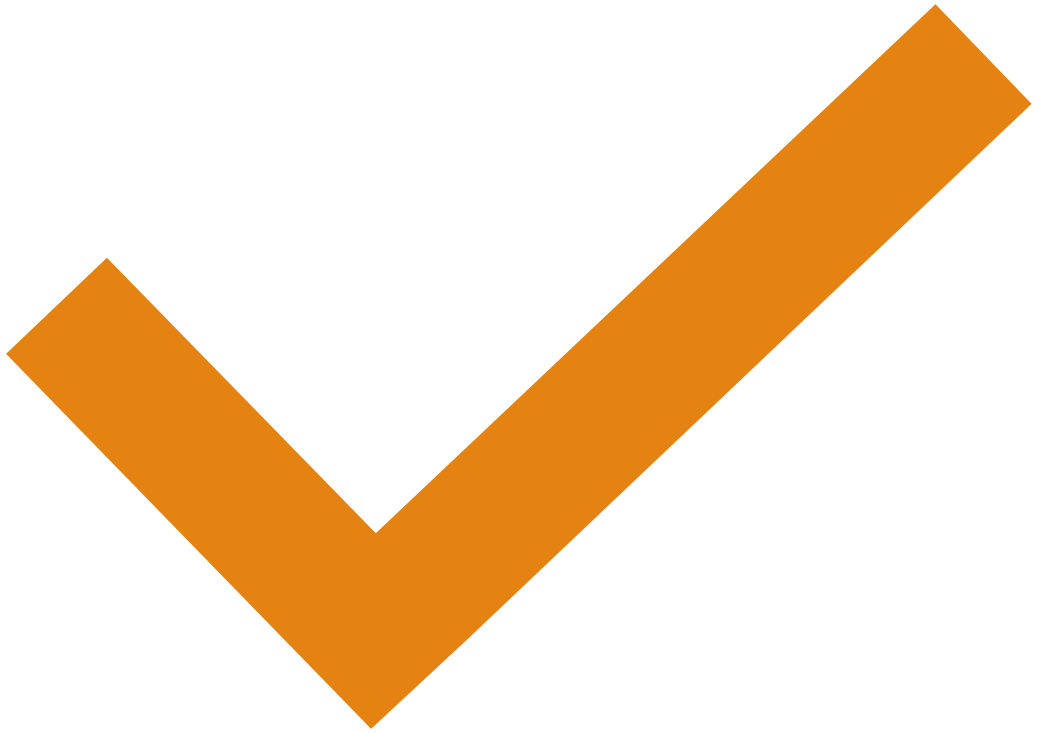
HL Regulatory Updates



AMENDMENT UPDATES

Amendment 105-REQUIREMENT OF VALVE INSTALLATION AND MINIMUM RUPTURE DETECTION STANDARDS

Amendment 106 REQUIREMENT OF VALVE INSTALLATION AND MINIMUM RUPTURE DETECTION STANDARDS: TECHNICAL CORRECTIONS

Amendment 107 PERIODIC UPDATES OF REGULATORY REFERENCES TO TECHNICAL STANDARDS AND MISCELLANEOUS AMENDMENTS

CASINGS---BIG PAIN

Shorted Casings---EVEN WORSE

195.575(A)

195.575(a) You must electrically isolate each buried or submerged pipeline from other metallic structures, unless you electrically interconnect and cathodically protect the pipeline and the other structures as a single unit.

A shorted casing occurs when there is direct metallic contact between a carrier pipe and a casing pipe.

An electrolytic shorted casing occurs when an electrolyte such as water, fills the annular space between the carrier pipe and the casing.

During the review and evaluation of the annual cathodic protection surveys, casings which may be shorted and, as such may affect the cathodic protection of the pipeline segment, shall be identified and listed for additional testing.

What does the operator's procedures require—what is their criteria

100mv difference between casing and carrier

"ESSENTIAL the SAME"
Determine what "Essential the same" means

2 CP Techs will have 2 different numbers

Done this—2 Techs 2 different numbers

1 said 50 mv
1 said 25mv
WHICH IS IT?

Shorted Casings---EVEN WORSE

The old timers-would use tape coat and make several wraps—eventually building up the “thinsulator”—when inserted—the wrap would roll back—review your installation records.

The old timers would orange peel the casing and weld to the carrier

Procedures

DO I HAVE A SHORT

Panhandle Eastern Test

Either interrupting current—ie Rectifier and taking reads or add current and interrupt-taking reads on casing and carrier

Shorted Casings--EVEN WORSE

For years—we were required to

Removing the casing.

Clearing the shorted condition.

Filling the annular space with an approved, high dielectric material .

Monitoring the casing with leak detection equipment. Immediate corrective actions shall be taken if a leak is discovered. Monitoring the condition of the pipeline inside the casing using data from in-line inspections.

Then we were allowed to go straight to monitoring—with any leak, would result in a classification of a Hazardous Leak—requiring immediate attention

Shorted Casings--EVEN WORSE

- March 11, 2019 another interp was given and required to
- Clear the short
- Fill with dielectric corrosion inhibitors
- Monitor with ILI if applicable

- Leak survey
- Implementing remedial measures to maintain the carrier pipe MOP based upon suitable remaining strength calculation methods

Good Luck

Inspectors will be reviewing records

Bonus Info

§195.452(g) What is an Information analysis

(xiii) AC/DC and foreign structure interference surveys

Something to think about

Know of liquid operators who operate gas also

They are applying the gas interference rule to their liquid lines

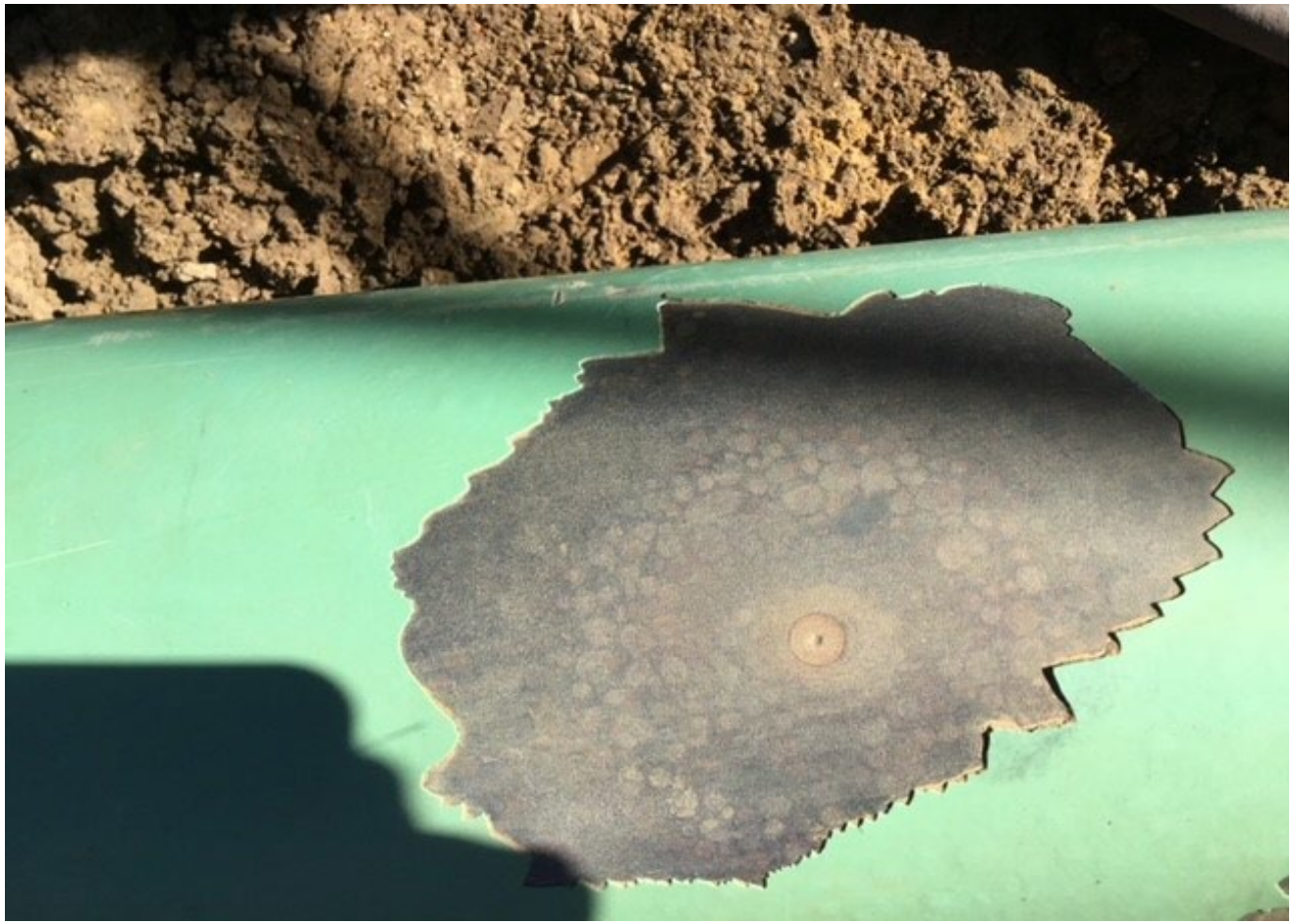
§ 195.577 What must I do to alleviate interference currents?

(a) For pipelines exposed to stray currents, you must have a program to identify, test for, and minimize the detrimental effects of such currents?

§ 195.575 Which facilities must I electrically isolate and what inspections, tests, and safeguards are required?

(e) If a pipeline is in close proximity to electrical transmission tower footings, ground cables, or counterpoise, or in other areas where it is reasonable to foresee fault currents or an unusual risk of lightning, you must protect the pipeline against damage from fault currents or lightning and take protective measures at insulating devices.

AC Interference



195.555

How do you verify the CP Supervisor is qualified.

How do you determine if they maintain a thorough knowledge for those sections they are responsible for.

Bonus info--

Magnetism of pipeline after ILI run

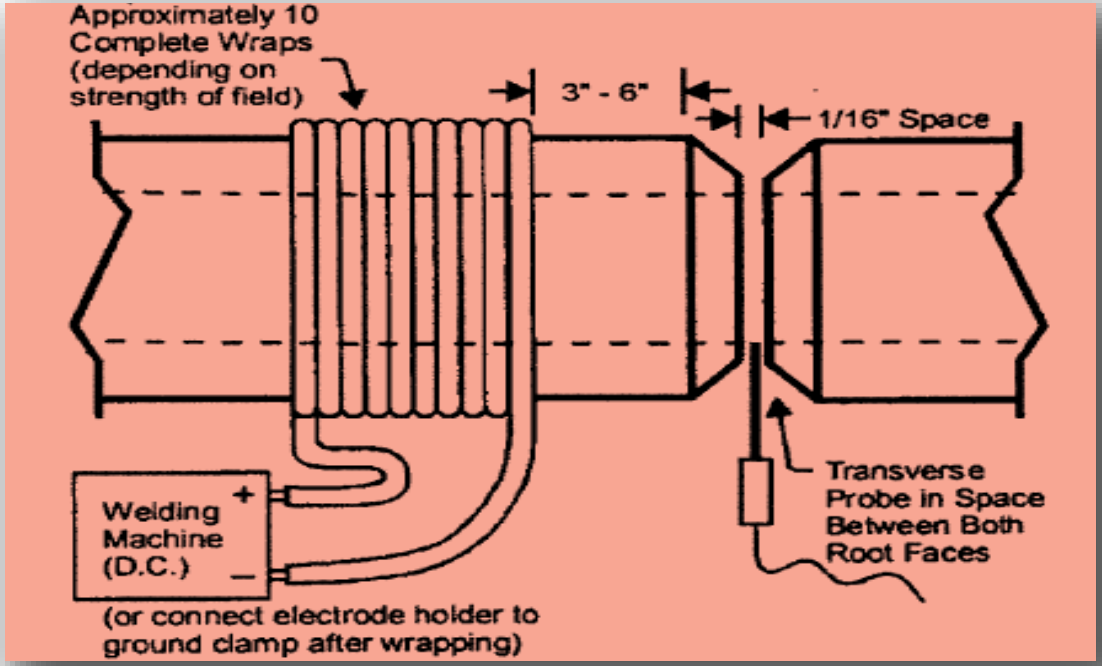
When installing a pup---Do you degausse

If not-it can lead to root bead cracking and xray might(cannot) pick it up

There have been incidents/accidents contributed to magnetism

Sequence of Steps to Reduce or Temporarily Eliminate Magnetic Field on Pipe Ends

Reducing or Temporarily Eliminating Magnetic Field



NOTE: On some projects, placing the coils one-half the diameter of the pipe from the joint to be welded reduced the field more than having the coil close to the joint.

Do you have procedures for when performing in-situ examinations

Phased Array

Ultrasonic testing

Magnetic Particle

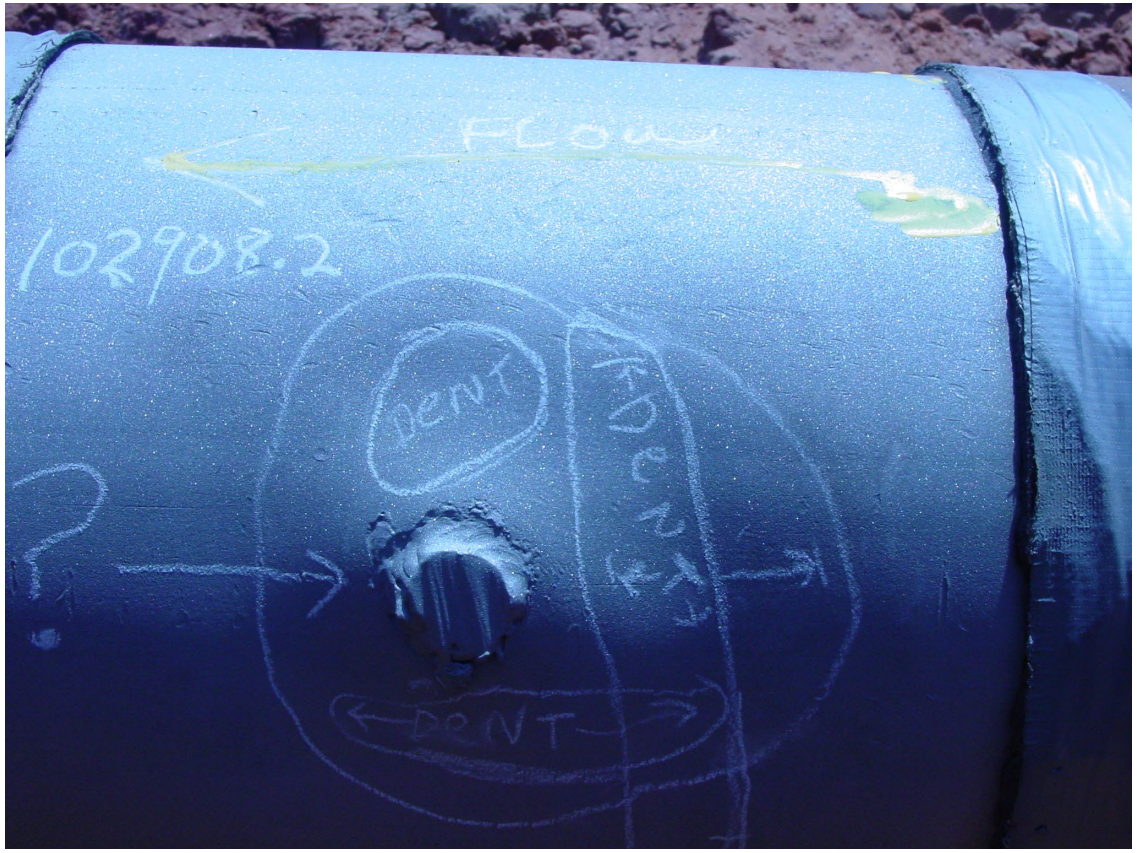
195.452(b)(6) Follow recognized industry practices in carrying out this section, unless-

(i) This section specifies otherwise; or

(ii) The operator demonstrates that an alternative practice is supported by a reliable engineering evaluation and provides an equivalent level of public safety and environmental protection.

195.452(g)(xvi)-Stress corrosion cracking (SCC) and other cracking (pipe body or weld) excavations and findings, including in- situ non-destructive examinations and analysis results for failure stress pressures and cyclic fatigue crack growth analysis to estimate the remaining life of the pipeline;

ASNT Recommended Practice No. SNT-TC-1A is for personnel qualifications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Questions