



United Kingdom Onshore Pipeline Operators' Association

**UKOPA/11/0078**

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## **UKOPA COMMENTS ON HSE'S PIPELINE INTEGRITY MANAGEMENT DELIVERY GUIDE**

Tony,

Thank you for giving UKOPA the opportunity to comment on the HID Pipeline Integrity Management Delivery Guide for Onshore Pipelines. The document is well written and appears to cover all of the key issues that should be addressed when undertaking pipeline inspection activities. UKOPA's comments are mostly items of detail and these are provided in the paragraphs on the next two pages.

In addition to these comments, as discussed at the meeting in Bristol, UKOPA would like the HSE to consider a change to the process such that pipeline operators are always informed of the outcome of the inspection, i.e. including when there is a positive outcome and there have been no major findings. This will provide the operator with positive feedback to allow him to understand how he is doing in terms of management of health and safety, and allow the responsible individuals within an organisation to be able to formally inform his senior management about the conclusions of the inspection.

We believe the above issue will be particularly relevant if the proposed charging regime is introduced under the proposed amendments to PSR, i.e. there will be situations where an operator receives a visit, is charged for the visit but then does not receive any formal notification of the outcome of the visit. Note that even if the PSR

amendments do not go ahead the gas pipeline operators will still be charged for these visits under GS(M)R so the same circumstance would apply.

### **Detailed Comments**

Section 5.1.4. discusses developments around the pipeline in the context of design compliance core intervention and states that ‘..’ the consequences of any planned developments near the pipeline are properly considered before planning approval is granted.’ We believe that this paragraph should recognise that development outside of the pipeline easement are outside of the pipeline operators control, it would be for the local authority to decide whether the development should be permitted based on advice from the HSE.

Section 5.1.4 also states that pipelines may need design enhancements to ensure the risk is suitably low. Suggest this section should recognise that where the development occurred following the construction of the pipeline, then as an alternative a suitable site-specific risk assessment could be used to prove that the risk is acceptable as an alternative to making a physical change.

Section 5.1.5, 8<sup>th</sup> bullet – this bullet point could also highlight that the pipeline design should also cover potential interaction with other infrastructure, e.g. AC power lines and DC transit systems, as well as other pipelines.

5.2.4 Suggest a section needs to be added for pipeline control room activities.

Also in this section as well as the checks including accidents/incidents/near misses investigated, lessons learned and shared within the organisation they could also include sharing learning with other industry groups e.g. UKOPA.

Section 5.3.1 – states that Inspectors will expect pipeline operators to consider and, where appropriate, utilise improved techniques and technologies. The document should recognise that new techniques and technologies would have to be proven to be safe and reliable before they are adopted.

Section 5.3.3. Inspection 8<sup>th</sup> bullet - Water crossings and exposed crossings are surveyed in accordance with a designated programme - suggest this could be broadened to include crossings over transport infrastructure e.g. roads, railways.

Section 5.3.3 Damage prevention 1<sup>st</sup> bullet – pipeline equipment protected from fire, impact and explosion. Pipeline equipment would not normally be protected as a matter of course only where for example the equipment was considered to be safety critical and need to be available in an emergency. Suggest this sentence is amended to – suitable protection is provided for vulnerable safety critical equipment.

Section 5.3.3 Damage prevention 2<sup>nd</sup> bullet refers to the use of Linesearch/Linewatch, UKOPA strongly support the use of Linesearch/Linewatch, but note that the Linewatch system is not an appropriate approach for gas transmission pipelines owned and operated by the Gas Distribution pipeline operators which also have long lengths of

low pressure pipelines. Suggest that this is changed to use of appropriate plant protection processes such as Linesearch/Linewatch.

Section 5.3.3 Other 1<sup>st</sup> bullet, Risk assessments carried out in relation to areas of non-compliance with current pipeline standards, e.g. high consequence areas and any special precautions (e.g. more frequent monitoring) implemented. Suggest this paragraph is amended to - Risk assessments carried out in relation to areas of non-compliance with current pipeline standards, e.g. high consequence areas and, if appropriate, remedial measures such as more frequent monitoring have been implemented.

Section 5.4.4 The success criteria could also include the interface with the control room, communication between field staff and control room staff .

Not a major issue but the current title implies that the document only covers integrity management, it is in fact broader than just the management of integrity, e.g. it also includes emergency response so we also ask you to consider whether the title needs amending e.g. to pipeline operations management delivery guide.

Please do not hesitate to contact me if you want to discuss any of the above comments.

Yours sincerely

**Neil Jackson**

**UKOPA Chairman**