

## Vermont Gas Systems, Inc. Summary of Integrity Management Program

The 107<sup>th</sup> Congress passed bill H.R. 3607 known as the “Pipeline Safety Improvement Act of 2002” into law on **December 17, 2002**. Upon passing the bill into law, it became Public Law 107-355 which can be found in its entirety at <http://www.gpoaccess.gov/plaws/>.

The Pipeline Safety Improvement Act of 2002 introduces several new requirements for Pipeline Operators including those specifically addressing Pipeline Integrity Management. Vermont Gas Systems, Inc. has developed an Integrity Management Plan based on these requirements. The following is a summary of the VGS plan:

**Purpose:** A comprehensive, systematic, and integrated integrity management program can provide a means to improve the safety of pipeline systems. The VGS IMP provides the information to effectively allocate resources for prevention, detection and mitigation activities that will result in improved safety and reduce the number of gas pipeline incidents.

**Identification of High Consequence Areas (HCAs):** A high consequence area is an area within a specific distance from VGS transmission lines where a pipeline failure could have a greater impact on public health and safety such as a highly populated locale or building.

**Data Gathering and Integration:** Pipeline data is collected, integrated and analyzed for the entire pipeline including construction, historical, operational, maintenance, and preventive measures data.

**Threat Identification:** For each HCA, VGS evaluates the integrated pipeline data to identify potential threats to that particular section of the pipeline including corrosion, construction defects, third party or other outside damage and operation error threats.

**Risk Assessment:** Upon evaluation of the threat exposure for each HCA, a risk assessment is developed utilizing accepted risk analysis methodologies to help prioritize integrity management plan activities.

**Development of a Baseline Assessment Plan:** The baseline assessment plan describes how each of the identified threats for each HCA is to be addressed and includes the direct assessment plan, assessment scheduling and procedures for minimizing environmental and safety risks.

**Remediation, Prevention and Mitigation Measures:** Prompt action is taken to address all anomalous conditions discovered during all integrity assessments. Additional measures must be taken to prevent a pipeline failure in an HCA and to mitigate the prospective consequences of a pipeline failure.

**Performance Plan:** A semi-annual evaluation is conducted to measure the effectiveness of the integrity management program over time.

**Record Keeping:** VGS maintains records to demonstrate compliance with the requirements of the pipeline integrity management program.

**Management of Change Plan:** VGS has formal management of change procedures in order to identify and consider the impact of changes to pipeline systems and their integrity.

**Quality Assurance Plan:** VGS incorporates a quality control plan to ensure that the requirements of the gas integrity management program are being met and to document integrity management procedures.

**Communications Plan:** A communications plan has been implemented to keep appropriate VGS personnel, jurisdictional authorities and the public informed about VGS pipeline integrity management efforts and the results of integrity management activities.