



Office of the Chairman

National Transportation Safety Board

Washington, DC 20594

October 22, 2015

Mr. Jack N. Gerard
President and Chief Executive Officer
American Petroleum Institute
1220 L St. NW
Washington, DC 20005-4070

Dear Mr. Gerard:

Thank you for your August 5, 2015, letter to the National Transportation Safety Board (NTSB) regarding Safety Recommendation P-12-17. We issued this recommendation to the American Petroleum Institute (API) on July 25, 2012, as a result of our investigation of the July 25, 2010, Enbridge Incorporated pipeline rupture and release in a wetland in Marshall, Michigan.

P-12-17

Facilitate the development of a safety management system standard specific to the pipeline industry that is similar in scope to your Recommended Practice [RP] 750, *Management of Process Hazards*. The development should follow established American National Standards Institute [ANSI] requirements for standard development.

We are pleased that you issued API RP 1173, *Pipeline Safety Management Systems* (PSMS), on July 8, 2015, to assist pipeline operators in reviewing an existing PSMS or developing and implementing a new PSMS.

We appreciate your consulting NTSB and Pipeline Safety and Hazardous Materials Safety Administration staffs and forming a standards work group to develop this standard in accordance with your *Procedures for Standards Development*, accredited by ANSI. We believe that RP 1173 provides an important framework for the pipeline industry's continuous improvement efforts and are pleased that it exceeds API 750 by addressing safety culture and other important safety issues. We also commend you for your swift action in forming the work group, developing the standard, and issuing it in under 3 years. In addition, we are very pleased with the commitment and efforts of the Interstate Natural Gas Association of America, the Association of Oil Pipelines, and the American Gas Association (AGA) to promote and facilitate the adoption of RP 1173 by pipeline companies. We understand that nine AGA

member companies have already committed to pilot implementation of the recommended practice.

The content of API Recommended Practice 1173 exceeds our original intent in issuing Safety Recommendation P-12-17; accordingly, the recommendation is classified “Closed—Exceeds Recommended Action.”

Thank you for your assistance and for your leadership in pipeline safety.

Sincerely,

cc: David Miller, PE, F.ASCE
Director, Standards Development
Global Industry Services