

November 23, 2011

2137-0522 Change Justification.

PHMSA is primarily making 2 minor, non-substantive changes to the Mechanical Fitting Failure Form (MFFR) and Instructions (PHMSA F-7100.1-2). The changes will not impact the estimated burden. In addition, we are uploading updated incident forms that contain minor edits (e.g., adding asterisks around certain items to indicate that they base information)

First, operators have contacted PHMSA with problems on drafted MFFR where they need some sort of unique number associated with the MFFR's they have drafted and cannot remember which report is which (other than the number provided by PHMSA). As a result, multiple drafts are developed for a singular reportable failure that is then submitted. PHMSA is **revising the form** so the operator can enter a unique identifier for each MFFR generated from the operator's system used to track MFFs rather than trying to tie a PHMSA's tracking number back to their system's tracking number.

Second, PHMSA has received some requests for more details regarding the type of fitting failures that PHMSA is seeking to collect data on, and clarification in the MFFR Instructions that is consistent with the Final Rule and regulatory language. As a result PHMSA is **revising the MFFR Instructions in Part C**, as follows with the additions in **red** and deletions "struck through" (e.g. ~~..reporting..~~):

"PART C – MECHANICAL FITTING FAILURE DATA - Make an entry in each block for which data are available. Some companies may have very old pipe for which installation records do not exist. Estimate data if necessary. Avoid entering "Unknown" if possible.

~~For reporting purposes operators must report mechanical fittings that consist of specifically designed components including an elastomer seal and a gripping device to affect pressure sealing and/or pull-out resistance capabilities.~~ **Operators must r**Report data for each failure of a mechanical fitting that resulted in a hazardous leak during the calendar year. Report all types and all sizes of mechanical fitting failures which resulted in a hazardous leak regardless of the material composition of the fitting. The reporting requirements apply to failures in the bodies of mechanical fittings, failures in the joints between the fitting and the pipe, and when the pipe pulls out of fitting. Operators are to report mechanical fitting failures that resulted from any cause. **PHMSA does not intend to collect information about failures of cast iron bell & spigot joints unless the leak resulted from a failure of a mechanical fitting used to repair or reinforce a joint."**