

Pipeline and Hazardous Materials Safety Administration (PHMSA) Special Conditions for Keystone XL	
“Special Condition”	What special conditions actually does
1. Steel Properties	Describes features of steel used in Keystone XL - these are characteristics of pipeline steel. Welspun, the source of defective pipeline steel and provider for Keystone I, produces steel with this specification .
2. Manufacturing Standards	Requires steel to be manufactured so as to be “as good” as it is rated. In other words, to ensure it doesn’t fall below minimum safety standards.
3. Fracture Control	Requires pipe steel to comply with the standards that were already required in 49 CFR § 195.106
4. Steel Quality Control	Requires a quality control program to ensure the steel isn’t defective (to avoid problems encountered with Keystone I). This doesn’t make for stronger steel than minimum standards require.
5. Pipe Seam Quality Control	Requires TransCanada to ensure welds meet minimum requirements
6. Monitoring for Seam Fatigue from Transport	TransCanada must inspect pipeline after transport to ensure it wasn’t damaged – and still meets minimum standards.
7. Puncture Resistance	Steel pipe must be puncture resistant to 65 tons.
8. Mill Hydrostatic Test	Pipeline must meet testing standards already required in 49 CFR §§ 195.557; 195.559, 195.563.
9. Pipe Coating	TransCanada must apply pipeline coating to pipe properly. It would be a cause of concern if regulators did not require other operators to avoid defects in pipeline coating and its application.
10. Field Coating	Coating applied in the field must also be applied properly and avoid defects.
11. Coatings for Trenchless Installation	TransCanada must ensure that it does not destroy the coating during pipeline installation. Again, because Keystone XL is required to have a coating by law, this only ensures that the pipeline meets minimum standards.
12. Bends Quality	TransCanada must ensure that pipeline bends are not constructed using defective steel or poor methods.
13. Fittings	All pressure rated fittings and components must be rated for a pressure commensurate to the pressure at which the pipeline will operate. It would be very concerning if this wasn’t required of all pipelines.
14. Pipeline Design	TransCanada must meet the minimum design factor required of all pipelines in 49 CFR § 195.106. TransCanada must consult with pipeline regulators to ensure that the pipeline continues to meet that minimum standard.
15. Temperature Control	Keystone XL will not operate above 150 F. While pipeline regulations don’t have a specific temperature requirement, conventional pipelines don’t run this hot.
16. Overpressure Control	Keystone XL must meet minimum safety standards outlined in 49 CFR §§ 195.406(b), 195.428.
17. Construction Plans and Schedule	TransCanada must submit its construction plans and schedule to PHMSA for review (not approval). Of course, TransCanada has already made these plans public.

18. Welding Procedures	TransCanada must meet minimum safety standards outlined in 49 CFR §§ 195.214; 195.228, 195.230 and 195.234
19. Depth of Cover	TransCanada agreed to bury Keystone XL six to twelve inches deeper than required by minimum safety standards. This was a part of Keystone XL's design before TransCanada agreed to it as a condition.
20. Construction Tasks	TransCanada must comply with 49 CFR § 195.501
21. Interference Currents Control	TransCanada must comply with 49 CFR § 195.577
22. Pressure Test Level	TransCanada agreed to comply with 49 CFR § 195.304 – though TransCanada will run the test for eight hours rather than four, and at 1.39 Maximum Operating Pressure (MOP) rather than the bare minimum of 1.25 MOP.
23. Assessment of Test Failures	If the pipeline fails a test and does not meet minimum safety standards, TransCanada must investigate the cause of the failure and tell PHMSA about it.
24. SCADA System	The requirement for Keystone XL to have a control room that monitors and controls the pipeline system is rather ridiculous, as it would be very difficult for a major pipeline could not run without such a system. Of course TransCanada already planned to have a SCADA system.
25. SCADA System Requirements	TransCanada will comply with 49 CFR § 195.446
26. SCADA – Alarm Management	TransCanada will comply with minimum safety requirements in 49 CFR § 195.445(e)
27. SCADA Leak Detection System (LDS)	TransCanada will comply with minimum safety requirements in 49 CFR §§ 195.134, 195.444 and associated standards.
28. SCADA Pipeline Model and Simulator	Requires the SCADA pressure monitoring system to have a model validation plan.
29. SCADA Training	TransCanada will comply with 49 CFR § 195.446(h)
30. SCADA Calibration and Maintenance	TransCanada agrees to comply with minimum safety requirements in 49 CFR §§ 195.134, 195.444
31. SCADA Leak Detection Manual	PHMSA apparently decided it would be a good idea for TransCanada to agree to follow Canadian minimum safety standards for their Calgary, Alberta control system. Of course, TransCanada had already agreed to obey this Canadian law in its application to Canada's National Energy Board.
32. Mainline and Check Valve Control	TransCanada agrees to comply with 49 CFR §§ 195.105, 195.260; in its original proposal, it agreed to have new valves (74 intermediate and 30 at pump stations). It has since agreed to install 2 additional intermediate valves.
33. Pipeline Inspection	TransCanada agrees to comply with 49 CFR § 195.120 (this condition repeats the minimum safety standard almost word for word).
34. Internal Corrosion	TransCanada agrees to limit basic, sediment and water content to 0.5% - a requirement that the Federal Energy Regulatory Commission (FERC) already requires. And a level that has been cited as a potential risk.
35. Cathodic Protection	TransCanada agrees comply with 49 CFR § 195.563. Minimum standards require a cathodic protection system to be operational within a year of service. TransCanada agrees to have its system operational within 6

	months.
36. Interference Current Surveys	TransCanada agrees to comply with 49 CFR § 195.577
37. Corrosion Surveys	TransCanada agrees to comply with 49 CFR § 195.452
38. Initial Close Interval Survey	TransCanada agrees to comply with 49 CFR § 195.452. Minimum standards require the pipeline to be surveyed within two years; TransCanada will survey Keystone XL within one year of operation.
39. Coating Condition Survey	TransCanada agrees to comply with 49 CFR § 195.573
40. Pipeline Markers	TransCanada agrees to comply with 49 CFR § 195.410
41. Pipeline Patrolling	TransCanada agrees to comply with 49 CFR § 195.412
42. Initial ILI*	TransCanada agrees to comply with 49 CFR § 195.452
43. Deformation Tool*	TransCanada agrees to comply with 49 CFR § 195.452
44. Future ILI*	TransCanada agrees to comply with 49 CFR § 195.452
45. Verification of Reassessment Interval*	TransCanada agrees to comply with 49 CFR §195.452
46. Flaw Growth Assessment*	TransCanada agrees to comply with 49 CFR § 195.452
47. Direct Assessment Plan*	TransCanada agrees to comply with 49 CFR § 195.452
48. Damage Prevention Plan	TransCanada agrees to comply with 49 CFR § 195.442
49. Anomaly Evaluation and Repair	When TransCanada evaluates anomalies, it must do so according to legal requirements under 49 CFR § 195.452.
50. Reporting - Immediate	TransCanada will comply with 49 CFR § 195.52 and, in addition to notifying the National Response Center when a release occurs, TransCanada will also notify PHMSA.
51. Reporting – 180 day	TransCanada will report on its compliance with these “conditions” within a 180 days of the in-service date
52. Annual Reporting	TransCanada will annual report on compliance with these conditions and will also comply with its legal requirements to make various reports to PHMSA under 49 CFR §§ 195.55, 195.64 and 195.402
53. Threat Identification Evaluation	TransCanada agrees to comply with 49 CFR § 195.452
54. Right of Way Management Plan	TransCanada agrees to comply with 49 CFR §§ 195.440; 195.442
55. Records	TransCanada will maintain copies of the reports that it sends PHMSA
56. Certification	Reports must be signed by someone with executive authority in the company.
57. Briefing	The first year that TransCanada sends its reports to PHMSA, the company will also do an in-person briefing that explains the reports.

* Six conditions require that TransCanada apply certain Integrity Management Plan procedures on Keystone XL. While these tests were already required on portions of the pipeline in High Consequence Areas, these conditions may require additional tests on portions of the pipeline that aren't in HCAs. They do not, however, require the entire pipeline to be subject to an integrity management plan.