

Mr. Robert H. Morrison, III
Nesom, Mellon, Cavanaguh & Due
Attorneys at Law
519 Florida Boulevard
Denham Springs, Louisiana 70726

Dear Mr. Morrison:

This is in reply to your letter of December 14, 1970, concerning plans of inspection and maintenance required by the provisions of 49 CFR, Section 192.17.

To answer your questions specifically and in the order presented:

1. There are no requirements as to the qualifications of the person who prepares the plan. It should be prepared by someone acquainted with the system and should at least meet the inspection and maintenance requirements of 49 CFR, Part 192, a copy of which is enclosed.
2. We have no detailed instructions for preparing such plans. Hopefully, after we received the annual reports required under Part 191, and the first submission under Section 192.17 we may be able to develop guidelines.
3. Your statement is correct. Submission under Section 192.17 for facilities in the State of Louisiana must be made to this office.

Thank you for your interest in the pipeline safety program.

Sincerely,

/signed/

Joseph C. Caldwell
Director, Acting
Office of Pipeline Safety