

April 5, 1971

Mr. J. Lee Ballard  
Sr. Vice President  
Conam Inspection, Inc.  
1385 Witherspoon Street  
Rahway, New Jersey 07067

Dear Mr. Ballard:

This is in reply to your letter of February 17, 1971, concerning the interpretation of 49 CFR, Section 195.234(g), relating to liquid pipelines, and asking whether this section requires that each completed weld radiographed must be located exactly by stake number and that the radiograph number and weld number be listed on a form showing this location, or whether just the number of welds made and the number of radiographs exposed must be shown by location, as is required by 49 CFR, Section 192.243(f), relating to gas pipelines.

It is our interpretation that Section 195.234(g) requires that each radiograph be located as exactly as is practicable in the particular circumstances.

We are aware that this record-keeping requirement for liquid lines is more restrictive than that for gas pipelines contained in 49 CFR, Section 192.243(f). It is our intent to evaluate these differences in the near future to determine the advisability of making the two rules more consistent.

We appreciate your interest in pipeline safety.

Sincerely,

Joseph C. Caldwell  
Acting Director  
Office of Pipeline Safety

February 17, 1971

Department of Transportation  
Office of Pipeline Safety  
400 6th Street Southwest  
Washington, D. C. 20590

Attention: Mr. J. C. Caldwell

Gentlemen:

Please provide an official interpretation of Title 49, Part 195.234 (g).

Does this part indicate that each completed weld radiographed must be located exactly by stake number and that the radiograph number and weld number be listed on a form showing this location? e.g., weld number 500, radiograph number 385 made on weld number 500 is located at stake number 125 + 342, or does this part indicate that the number of welds made and the number of radiographs exposed be shown by milepost, engineering station, or by geographic feature? (Title 49, Part 192.243 (F) e.g., 25 welds completed 15 radiographed between Highway 170 and Highway I 75).

An immediate reply to this question is requested since several miles of liquid pipeline construction is planned to commence in early 1971.

Please contact me should you require additional information regarding this request.

Very truly yours,

CONAM INSPECTION, INC.

J. Lee Ballard  
Sr. Vice President