

Mr. G. Frank Bright  
Sales Manager  
Safety Relief Valves  
Anderson, Greenwood & Co.  
P. O. Box 400  
Bellaire, Texas 77401

Dear Mr. Bright:

This is in reply to your letter of July 13, 1971, requesting an interpretation of paragraph 192.505(d). You specifically questioned the use of sub-paragraph(d)(2), instead of Section 192.145, for the strength testing of safety relief valves prior to operation.

It is intended that all valves including safety relief valves meet the applicable requirements of Section 192.145. Paragraph 192.145(a) requires, in part, that each valve meet the minimum requirements of one of three specifications or the equivalent including API Standard 6D. Section 5.1 of API Standard 6D states, "All pressure tests required in this section (Section 5) shall be made on all completed valves prior to shipment from the manufacturer's works." The words "each valve" and "equivalent" in paragraph 192.145(a) are used in the sense of providing quality control and inspection for all valves that would at least be equivalent to that specified for the specific valves mentioned in API 6D. For example, the listed specifications do not cover all sizes and types of valves, but a valve of a size or type not covered should at least meet the applicable safety requirements in the listed specifications. Even though relief valves are not included by name in API Standard 6D, safety requirements "equivalent" to those elaborated in API Standard 6D must be.

It is recognized that individual pieces of many types of components, such as pipe ells, tees, and couplings are not individually strength tested at the time of manufacture. Paragraph 192.505(d) gives the operator an option when such a component is being replaced. This section is intended for situations where a component cannot as a practical matter be given a post-construction test. The operator, therefore, does not have to remove the segment of pipeline containing the replaced component and test the entire segment to prove the item has been pretested per sub-paragraph 192.505(d)(1), or a prototype of the component was tested per sub-paragraph 192.505(d)(2).

Please contact me if I can be of any further assistance in this matter.

Sincerely,

/signed/

Joseph C. Caldwell  
Acting Director  
Office of Pipeline Safety