

PI-71-0113

June 18, 1971

Mr. LeRoy Yuen
Utilities Administrator
Hawaii Public Utilities Commission
P. O. Box S41
Honolulu, Hawaii 56809

Dear Mr. Yuen:

This is in reply to your letter of May 17 1971, concerning qualification of welders who weld on pipe being operated at stress levels of less than 20% of SMYS.

We agree with your interpretations that a welder who welds on pipe being operated At less than 20% of SMYS need only fulfill the requirements Of 49 CFR, Section 192.227(c). However, we cannot agree with the statement in the third paragraph of Mr. Anderson's letter where he states they "Consider the basic test to be all inclusive." Section 192.227(c) requires that welders who' make welded service line connections to mains qualify under Section II of Appendix C in addition to the basic test of Section I.

If we can be of further assistance, please let us know.

Sincerely,
Original signed by:
Joseph C. Caldwell
Acting Director
Office of Pipeline Safety

State of Hawaii
Public Utilities Commission
Department of Regulatory Agencies
P.O. Box 541
Honolulu, Hawaii 96809

May 17, 1971

Office of Pipeline Safety
Department of Transportation
400 Sixth Street, S. W.
Washington, D. C. 20590

Attention: Mr. Joseph Caldwell, Acting Director

Gentlemen:

The Honolulu Gas Company, Ltd., has requested verification of their interpretation of paragraph 192.227 (a) of 49 USC Part 192 as shown in the accompanying Honolulu Gas Company letter dated April 22, 1971.

The Honolulu Gas Company system was designed for a maximum operating pressure of 125 psi but operates at a maximum of 60 psi. The calculated hoop stresses at these pressures for the maximum sized pipes are 16 and 7.66 percent, respectively, of the specified minimum yield strength.

Since these hoop stresses are below 20 percent of the specified minimum yield strength, we are in agreement with their interpretation but would appreciate your opinion.

Very truly yours,
LeRoy Yuen
Utilities Administrator

Honolulu Gas
1050 Bishop Street
P.O. Box 3379
Honolulu, Hawaii 96301

April 22, 1971

The Honorable Chairman and Members of the Public Utilities Commission
Honolulu
Hawaii

Attention: Mr. Vernon Nunokawa
Executive Director

Gentlemen:

We would like verification of our interpretation of paragraph 192.227 (a) of 49 USC Part 192, and the paragraphs referenced therein.

Since the Honolulu Gas Company's distribution system is operated at a pressure that produces a hoop stress of less than 20 percent of the specified minimum yield stress, we feel that we qualify for the exception (c) as noted in paragraph 192.227 (a). We specifically refer to the referenced Section I Basic Test of "Appendix C, Qualification for Welders of Low Stress Level Pipe".

We further consider the basic test to be all inclusive for the minimum requirements for qualification for welders of low stress level pipe.

Your consideration of this matter and verification of our interpretation that we qualify for the exception and that the test is all inclusive will be appreciated.

Very truly yours,
E.F. Anderson, Jr.
Director
Material & Distribution