

PI-71-0116

August 26, 1971

Mr. W.L. Craig
Vice President
Texas Metals, Inc.
4519 Sigma Road
Dallas, Texas 75240

Dear Mr. Craig:

Thank you for your letter of August 5, 1971, regarding the requirements for retention of X-ray film.

Section 195.234(g) of 49 Code of Federal Regulations, that applies to non-destructive testing of welds and retention of records for the transportation of liquids by pipeline, includes the retention of the developed film. The records must be retained for three years, and there is no provision for micro-filming or other condensation of X-ray records.

Part 192 of 49 Code of Federal Regulations, that applies to transportation of natural and other gas by pipeline, has no provision for retention of film. A retention provision was not included in the final rule after evaluation of the comments submitted on the notice of proposed rulemaking.

We hope that this clarifies the requirements for the retention of X-ray film to your satisfaction. Should you have any further questions please advise.

Sincerely,
Joseph C. Caldwell
Acting Director
Office of Pipeline Safety

Texas Metals, Inc.
4519 Sigma Road
Dallas, Texas 75240

August 5, 1971

Pipeline Safety Division
Department of Transportation
4000 6th Street S.W.
Washington, D.C. 20590

ATTN: JOSEPH C. CALDWELL - ACTING DIRECTOR

Dear Mr. Caldwell:

My Company is in the business of reclaiming silver from used x-ray film. We would like to know if micro-filming records would be acceptable for the recent department of transportation directive to all oil companies stating that their pipe line test x-ray film are to be held for a three (3) year period. I would appreciate a legal opinion to the affect of whether or not the micro-filming of the original x-rays would be acceptable to your legal department.

If the micro-film records are not acceptable, would you please let me know about some other form of condensation these records. Do to the amount of silver involved I would appreciate a response as soon as possible.

Thank you.

Yours truly,
W. L. Craig
Vice President