

March 31, 1972

Mr. M. F. Gavet
Philadelphia Electric Company
1000 Chestnut Street
Philadelphia, Pennsylvania 19105

Dear Mr. Gavet:

This will acknowledge receipt of your letter dated March 9, 1972, regarding a leak in your gas system on February 20, 1972.

In order to provide you with a better understanding of the leak reporting requirements Part 191, 49 CFR, this office uses a strict interpretation of Section 191.5(a)(3). This means that any igniting of gas, irregardless of the size of the fire, as a result of a leak must be reported to this office. The difficulty in excluding some fires because of a small size, is that this regulation would be subject to the varying interpretations of the different gas operators. This would make the reporting requirements difficult to regulate and cast doubts upon the validity of the statistical information acquired. In the future, please use a strict interpretation on the criteria for reporting leaks as required by Part 191, 49 CFR.

We have received your leak report, DOT F-7100.1 and it appears to be in order.

Thank you for your prompt attention to this matter, and your continued cooperation regarding pipeline safety.

Sincerely,

Joseph C. Caldwell
Acting Director
Office of Pipeline Safety