

September 26, 1973

Mr. Larry E. Waldrop  
Utilities Engineer  
Alabama Public Utilities Commission  
P. O. Box 991  
Montgomery, AL 36102

Dear Mr. Waldrop:

In your letter of September 5, 1973, you raised a question concerning the requirements of §192.465(a) for monitoring of cathodic protection on separately protected service lines or short sections of mains, not in excess of 100 feet. The question asked was: If all these services are tested in 1973, can only 3 percent be tested in each year and then do 100 percent in 1983, or must 10 percent of all these lines be tested each year?

Section 192.465(a) states in part: ". . . these service lines and mains may be surveyed on a sampling basis. At least 10 percent of these protected structures, distributed over the entire system, must be surveyed each calendar year, with a different 10 percent checked each subsequent year, so that the entire system is tested in each 10-year period." The intent here is for the operator to obtain a representative sampling of conditions throughout his system annually. It is our contention that this representative sampling should be at least 10 percent, and a different 10 percent each year so that the operator would be made aware of any condition occurring that could be detrimental to public safety. The procedure described in your letter would not cover 10 percent of the system each year and would not be considered a sampling survey. It would therefore not meet the requirements.

If we may be of further assistance, please advise.

Sincerely,

Joseph C. Caldwell  
Director  
Office of Pipeline Safety