

PI-73-0115

August 16, 1973

Mr. Larry L. Waldrop
Utilities Engineer
Alabama Public Service Commission
P.O. Box 591
Montgomery, AL 36102

Dear Mr. Waldrop:

This is in response to your letter dated July 26, 1973, in which you ask for further clarification of an interpretation of Section 192.619 that we sent you on June 19, 1973.

You indicate that you would like to resubmit your question to read:

"If a high pressure distribution system, constructed of steel pipe, was tested at 100 psig for a designed maximum operating pressure of 60 psig, is determined to be in good condition and has service lines equipped with single service regulators equipped with full capacity internal relief valves, is the MAOP still 60 psig even though it may have been operated only at somewhat lower pressures for a number of years."

Section 192.619 establishes a maximum allowable operating pressure for all steel and plastic pipelines. The requirements of Section 192.621 are additional requirements which apply to high pressure distribution systems defined in Section 192.3 as those systems in which the gas pressure in the main is higher than the pressure provided to the customer. Therefore, both sections must be complied with when operating a high pressure distribution system in order to establish a maximum allowable operating pressure.

Our answer to this question that we gave you in our letter of June 19, 1973, is still correct. The MAOP is 30 lbs.

If you have any further questions in this regard, please let us know.

Sincerely,
Joseph C. Caldwell
Director
Office of Pipeline Safety

State of Alabama
Alabama Public Service Commission
P.O. Box 991
Montgomery, Alabama 36102

July 26, 1973

Mr. Joseph C. Caldwell
Director
Office of Pipeline Safety
Office of the Secretary of Transportation
Washington, D.C. 20590

Dear Mr. Caldwell:

In my letter of June 1, 1973, I raised a question about the MAOP of a gas system as follows. "If a gas system is an all steel system and designed and tested for a 100 lbs. system and has only operated at 30 lbs. for the last ten years, what is its' MAOP?"

Your reply of June 19, 1973, correctly stated that under 192.619(c) the MAOP would be 30 lbs. My question, however, was unclear in that I failed to state that the system in question was a "high pressure distribution system" built of steel, still in good condition and which had been tested at 100 lbs. for a maximum operating pressure of 60 lbs.

Under the provisions of paragraph 192.621 which specifically spells out MAOP for high pressure distribution systems, the MAOP for the system described would be 60 lbs. provided it is equipped with suitable over pressure devices and that all other provisions of 192.621 are met, regardless of its' previous operating pressures.

I would like to resubmit my question as follows:

"If a high pressure distribution system, constructed of steel pipe, was tested at 100 psig for a designed maximum operating pressure of 60 psig, is determined to be in good condition and has service lines equipped with single service regulators equipped with full capacity internal relief valves, is the MAOP still 60 psig even though it may have been operated only at somewhat lower pressures for a number of years?"

Your prompt reply to this question will be greatly appreciated.

Yours very truly,
Larry E. Waldrop
Utilities Engineer