

PI-74-0135

August 23, 1974

Wm. M. Valentine, Esq.
Valentine, Fisher & Tomlinson
520 Lloyd Building
Seattle, WA 98101

Dear Mr. Valentine:

This is in response to your letter of August 8, 1974, in which you suggest that the word "not" should be inserted in sections 192.455(d) and 192.457(a) to clarify that coated and tested pipe is acceptable without cathodic protection.

There is no error in the regulations as published. The intention of the regulations is that pipe must be cathodically protected as well as coated. We hope this clarifies the matter for you.

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

Valentine, Fisher & Tomlinson
520 Lloyd Building
Seattle, Washington 98101

August 8, 1974

Director, Office of Pipeline Safety
Department of Transportation
400 7th Street
Washington, D.C. 20590

Dear Sir:

Re: Title 49, Part 192
Code of Federal Regulations

Section 192.455(2)(b)(c) and (d) (enclosed) do not appear to make sense unless the word "not" is inserted in the third line of (d).

Also Section 192.456(a) does not make sense unless the word "not" is inserted in the fifth line.

It appears that the intent was that the word "not" should be inserted as indicated above. In so doing, the exceptions spelled out in 192.455(b) and (c) make logical reading and allow properly coated and tested pipe acceptable without cathodic protection.

Could you please advise if amendments (which are not available) have been issued or will be issued inserting the word "not" as it appears to be the intent?

Yours very truly,
VALENTINE, FISHER & TOMLINSON
Wm. M. Valentine