

January 21, 1977

Mr. Daniel W. Coughlin
Engineer
National Fuel Gas Distribution Corporation
10 Lafayette Square
Buffalo, NY 14203

Dear Mr. Coughlin:

This is in response to your letter of September 13, 1976, indicating an apparent inconsistency between interpretations on welder qualification in Office of Pipeline Safety Operations' Advisory Bulletins 72-10 and 76-8. The interpretation in Bulletin 72-10 indicated that to comply with Section 192.229(c), welders qualified under the multiple qualification test of Section 3.2 of API Standard 1104 need have only one weld (butt weld or fillet weld) tested each 6 months period and found acceptable under either Sections 3 or 6 of API Standard 1104 in order to continue welding. The interpretation in Bulletin 76-8 states that "when a welder initially qualifies for more than one welding procedure, to maintain the qualification for a particular procedure, the welder must have a weld using that procedure tested, and found acceptable."

The statement in Advisory Bulletin 76-8 was intended to apply to situations where a welder qualifies by the single qualification test in API Standard 1104. The statement was not intended to apply to the multiple qualification test contained in the standard.

A welder qualified by the multiple qualification test of Section 3.2 of API Standard 1104 is qualified to weld using many different procedures and is subject to requalification only if one of the three essential variables listed in Section 3.21 is changed in the welding procedure specification being used by the welder.

When the welder is qualified by multiple qualifications, only one weld each 6 month period must be tested and found acceptable under either Sections 3 or 6 of API Standard 1104 in order to comply with Section 192.229(c) as indicated in Bulletin 72-10.

Thank you for bringing the matter to our attention. I hope this clarifies the interpretation. Please contact me if I can be of any further assistance in this matter.

Sincerely,

Cesar DeLeon
Acting Director
Office of Pipeline
Safety Operations

September 13, 1976

Department of Transportation
Materials Transportation Bureau
Washington, D. C. 20590

Gentlemen:

The interpretation of the welding regulation in OPSO Advisory Bulletin 76-8 does not seem to be consistent with the interpretation in OPS Advisory Bulletin 72-10.

A welder who successfully completes the Multiple Qualification in Section 3 of API 1104 follows a welding procedure to make the test weld, but becomes qualified to use many different welding procedures.

There are 12 essential variables that if changed in a given procedure, require that a new procedure be qualified. There are only 3 essential variables that would require a welder, who had passed the multiple qualification, to requalify.

The interpretation in Bulletin 76-8 says that a welder must have a weld tested using each particular procedure for which he is qualified to keep his qualification current in those particular procedures.

This latest interpretation does not seem consistent with the Scope of the Multiple Qualification in API 1104.

Very truly yours.

D. W. Coughlin
Engineer

NOTE: ATTACHMENTS OF OPSO ADVISORY BULLETINS No. 76-8, August 1976 and No. 72-10, October 1972.