

7-2-81

**NAME OF PERSON:** Frank Fulton

**SUBJECT:** 195.220 Welds, Filler Metal

**DIGEST:** Bill Gloe of OPSR informed me that Wes Pleslako [sic] of the Central Region has discussed with him the fact that a number of pipeline companies are in literal violation of 195.220 because the welding rods used to make a joint do not equal or exceed the highest SMYS of the pipe being welded. The pipeline companies like to make the weld a little more ductile so that cracks do not develop [sic].

Bill Gloe feels that 195.220 is poorly written and that the companies, while they may be in literal violation, are not making unacceptable welds.

**CONCLUSION:** Maybe after discussed with Central Region a request for interpretation should be made.

Bill Gute