

Mr. Dale W Johansen  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

Dear Mr. Johansen:

The enclosed interpretation has been issued in response to your letter of February 17, 1982.

Sincerely,

/signed/

Melvin A. Judah  
Acting Associate Director for  
Pipeline Safety Regulation  
Materials Transportation Bureau

Enclosure

No. 82-2  
Date: March 11, 1982

**DEPARTMENT OF TRANSPORTATION**  
**RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION**  
**MATERIALS TRANSPORTATION BUREAU**

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**PIPELINE**

**SAFETY REGULATORY INTERPRETATION**

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**NOTE:**

**A pipeline safety regulatory interpretation applies a particular rule to a particular set of facts and circumstances, and, as such, may ne relied upon only by those persons to whom the interpretation is specifically addressed.**

SECTION: 192.237(A) & 192.245(B)

SUBJECT: Preheating Welds to be Repaired

QUESTION: May carbon content of the base metal, or more specifically, carbon content as described in §192.237(a) be considered in determining the defective welds that must be preheated prior to repair under §192.245(b)?

INTERPRETATION: It is clear from the plain meaning of §192.245(b) that each weld segment to be repaired must be preheated. This standard contains no exception in regard to the carbon content in §192.237 pertain to preheating the new welding, not repair welding.

Melvin A. Judah  
Acting Associate Director  
for Pipeline Safety Regulation  
Materials Transportation Bureau

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Acting Associate Director  
Pipeline Safety Regulation  
MTB/RSPA/DOT  
400 7th Street, S.W.  
Washington, D. C. 20590

Dear Mr. Judah:

It is requested interpretations be made on the following points of concern in Title 49 CFR, Part 192.

Question #1: Are all defective welds to be repaired by the procedures described in 192.245(b) required to be preheated prior to the repair procedure regardless of the carbon content of the base metal?

Question #2: Are only those metals with a carbon content as described in 192.237(a) required to be preheated under the requirements of 192.245(b)?

I will certainly appreciate the most expeditious treatment you can offer in answering these questions. Should you have questions concerning this request please feel free to contact me at 314/751-3456

Sincerely,

Dale W. Johansen, Assistant Director  
Gas Department - Engineering Section