September 13, 1983

Mr. Dwight Pearson
Pipeline Safety Engineer
District of Columbia Public Service
Commission
451 Indiana Avenue, NW
Washington, DC 20001

Dear Mr. Pearson:

Your letter of July 14, 1983, requests an interpretation of §192.285(b)(2) relative to the use of the word "or" in a series of tests or inspections listed as alternative requirements for evaluating heat fusion, solvent cement, or adhesive joints. We do not feel that an interpretation is necessary on this point, since your question involves grammatical construction.

Throughout Part 192 the use of the word "or" between the last choice in a series and that immediately preceding it, as in §192.285(b)(2), means that any one of the choices listed in the series may be used. The word "or" is implied following each of the other choices in the series.

You also ask about the word "deformed" in §192.285(b)(2)(iii)(B) and particularly whether the deformation shown in attachments to your letter provide an acceptable bend test. The rule requires the joint area to be deformed by bending, torque, or impact, but does not specify either elastic or inelastic deformation. The attachments to your letter illustrate one method of producing an appropriate strain that should cause flows in such heat fusion joints to be readily observable.

For your assistance in further application of §192.285, we are enclosing copies of the notice and final rule with amendments, for Docket No. PS-54, which established this rule.

We hope that this answers your questions to your satisfaction.

Sincerely,

Richard L. Beam
Associate Director for
Pipeline Safety Regulation
Materials Transportation Bureau

Enclosure

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