

July 3, 1984

Mr. Clinton [sic] McClure  
Project Consultant  
Williams Brothers Engineering Company  
1315 N. Main  
Helena, Montana 59604

Dear Mr. McClure:

This is in reply to your letter of June 22, 1984, asking about the method of measurement under §192.313(a)(2) of 49 CFR Part 192 when a dent exists in a bend section.

Section 192.313(a)(3) requires that bends have a smooth contour without mechanical damage. Therefore, the question you have asked is not relevant because the measurement of ovality under §192.313(a)(2) presumes a smooth contour.

We hope this reply is helpful in your pipeline safety effort.

Sincerely,

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

June 22, 1984

U.S. Department of Transportation  
Research and Special Programs Administration  
400 - 7th Street S.W.  
Washington, D.C. 20590

Reply to: 1315 N. Main  
Helena, Montana 59604

Attention: Mr. Richard L. Beam  
Associate Director for Pipeline  
Safety Regulations

Gentlemen:

Re: CFR, Title 49, Part 192.309(b)(3)(ii) and Part 192.313(a)(2) Interpretation of  
Method of Measurement

In a large number of cases the ovality of pipe in bends is associated with a dent. Where this occurs, the dent may be within the limits of 192.309(b)(1), 192.309(b)(2) or 192.309(b)(3). If the minimum diameter measurement referred to in 192.313(a)(2) is measured with one point (leg) of the outside caliper resting in the lowest point of the dent, the measured ovality is greater than if that point rests outside of this lowest point and may result in a rejection of the bend designated under 192.313(a)(2).

Our questions is:

At what location within or near the lowest point of the dent do we place the leg of the caliper to measure the minimum diameter of an ovality?

This question is being asked in conjunction with compliance action requested by the Montana Public Service Commission related to The Montana Power Company's natural gas pipeline. An early reply will be appreciated.

Very truly yours,

WILLIAMS BROTHERS ENGINEERING CO.

Clint McClure  
Project Consultant