

July 15, 1992

Mr. R. J. Pusanik
Vice-President Regulatory Affairs
Columbia LNG Corporation
20 Montchanin Road
Wilmington, DE 19807-0020

Dear Mr. Pusanik:

I am responding to your letter of June 3, 1992, regarding construction of new storage tanks and transfer piping at the Cove Point LNG Terminal. You sought concurrence that a planned pipe-in-pipe design fully meets 49 CFR 193.2127, 193.2135, 193.2149, 193.2151, 193.2183, 193.2223, and 193.2433.

Please note that as a combined transfer and impounding system, the pipe-in-pipe design would have to meet all Part 193 safety standards applicable to transfer piping and impounding systems, not just those listed above. For example, of particular concern is a standard you did not mention, 49 CFR 193.2167, governing covered impounding systems.

Because the Natural Gas Pipeline Safety Act of 1968 (49 App. U.S.C. 1671 et seq.) does not provide for pre-construction approval of LNG facilities, we normally do not conduct pre-construction compliance reviews. However, in view of the special pipe-in-pipe design and its potential impact on safety, we have decided to consider the proposed design at this early stage of development. To enable us to do so, please submit a report that explains how the design meets each applicable Part 193 safety standard. Although we do not grant or deny approvals, we will inform you if any design features raise a compliance concern.

You may submit the report to Ralph Kubitz, Chief, Eastern Region, Research and Special Programs Administration, U.S. Department of Transportation, 400 Seventh Street, S.W., Washington D.C. 20590. The Eastern Region office is responsible for inspecting the Cove Point LNG Terminal for compliance with Part 193. Mr. Kubitz will review the report and inform you of his finding.

Sincerely,

Douglas B. Ham,
Acting Administrator