



U.S. Department of Transportation
**Pipeline and Hazardous Materials
Safety Administration**

1200 New Jersey Ave, S.E.
Washington, D.C. 20590

OCT 06 2014

Mr. David J. Chislea
Manager of Gas Operations
Michigan Public Service Commission
6545 Mercantile Way
Lansing, Michigan 48909

Dear Mr. Chislea:

By letter to the Pipeline and Hazardous Materials Safety Administration (PHMSA) dated March 6, 2012, you requested an interpretation of certain pipeline welding requirements in 49 CFR Part 192. You stated that the Michigan Public Service Commission (MPSC) staff has identified instances where natural gas pipeline personnel performing welding operations utilize what is known as a "hinge" or "alignment" tack. You defined hinge or alignment tack as the deposition of filler metal at only one portion of a joint to aid in the lineup of the opposite side. By this process, a welder places filler metal at one location around the pipe joint and then the pipe is manipulated with heavy equipment to achieve better joint alignment elsewhere. The hinge or alignment tack can remain as part of the final weld.

You provided a summary of an operator's procedure as follows:

If constraints prevent the pipe segments from being adequately lined up, alignment tacks can be used if approved by the foreman. If approval is granted, an alignment tack less than 3" can be made and then the pipe can be shifted to attain the appropriate root opening for the remaining circumference. The root bead is then deposited, cleaned up, and the lineup clamps removed. At this point, the alignment tack is inspected for imperfections and if none exist the alignment tack can be left in as the root bead.

You stated that the MSPC believes the practice of applying a hinge or alignment tack and then moving the pipe to obtain better joint alignment is not acceptable per 49 CFR 192.235. Specifically, you request PHMSA's response to the following questions:

1. Whether placing a hinge or alignment tack and then moving the pipe to obtain better alignment elsewhere in the joint is an acceptable construction practice?
2. Whether the inclusion of a hinge or alignment tack into a finished weld which joint movement has taken place is a violation of § 192.235?

The Pipeline and Hazardous Materials Safety Administration, Office of Pipeline Safety provides written clarifications of the Regulations (49 CFR Parts 190-199) in the form of interpretation letters. These letters reflect the agency's current application of the regulations to the specific facts presented by the person requesting the clarification. Interpretations do not create legally-enforceable rights or obligations and are provided to help the public understand how to comply with the regulations.

3. Whether hinge or alignment tacks are acceptable practices for establishing pipe alignment provided they are removed after the lineup clamp has been placed and adequate root bead has been deposited?

In order to respond to your questions, we reviewed § 192.235 which states:

§ 192.235 Preparation for Welding

Before beginning any welding, the welding surfaces must be clean and free of any material that may be detrimental to the weld, and the pipe or component must be aligned to provide the most favorable condition for depositing the root bead. This alignment must be preserved while the root bead is being deposited.

Our responses to your questions are as follows:

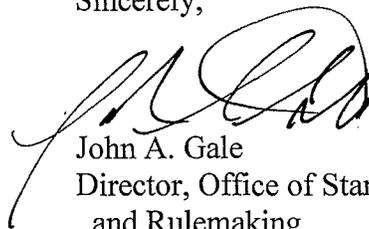
Response to question 1 – No, placing a hinge or alignment tack and then moving the pipe to obtain a better alignment elsewhere in the joint cannot meet the § 192.235 requirements because the alignment must be preserved while the root bead is being deposited.

Response to question 2 – Yes, the inclusion of a hinge or alignment tack into a finished weld which joint movement has taken place is a violation of § 192.235 because the alignment tack is compromised by the movement.

Response to question 3 – No, per responses 1 and 2 alignment tacks are not acceptable practices for establishing pipe alignment even if they are removed after the lineup clamp has been placed and adequate root bead has been deposited.

If we can be of further assistance, please contact Tewabe Asebe of my staff at (202) 366-5523.

Sincerely,



John A. Gale
Director, Office of Standards
and Rulemaking

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RICK SNYDER
GOVERNOR

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March 6, 2012

Office of Pipeline Safety (PHP-30)
Pipeline and Hazardous Materials Safety Administration (PHMSA)
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590-0001

Subject: Request for Interpretation of 49 CFR § 192.235

Dear Sir or Madam,

The Michigan Public Service Commission (MPSC) Staff has identified instances where natural gas pipeline personnel performing welding operations utilize what is known as a "hinge" or "alignment" tack. A hinge or alignment tack is defined as the deposition of filler metal at only one portion of a joint to aid in the lineup of the opposite side. For instance, an operator places filler metal at the top portion of a joint and then the pipe is manipulated with heavy equipment to close the gap at the bottom of the joint. This hinge or alignment tack can remain as part of the final weld.

A summary of an operator's procedure is as follows:

If constraints prevent the pipe segments from being adequately lined up, alignment tacks can be used if approved by the foreman. If approval is granted, an alignment tack less than 3" can be made and then the pipe can be shifted to attain the appropriate root opening for the remaining circumference. The root bead is then deposited, cleaned up, and the lineup clamps removed. At this point, the alignment tack is inspected for imperfections and if none exist the alignment tack can be left in as the root bead.

The MSPC staff believes the practice of applying a hinge or alignment tack and then moving the pipe to obtain better joint alignment is not acceptable according to 49 CFR § 192.235 and wishes to confirm this belief through this request for interpretation.

49 CFR § 192.235 states, "Before beginning any welding, the welding surfaces must be clean and free of any material that may be detrimental to the weld, and the pipe or component must be aligned to provide the most favorable condition for depositing the root bead. This alignment must be preserved while the root bead is being deposited."

At your earliest convenience, please provide PHMSA's response to the following questions:

1. Is the practice of placing a hinge or alignment tack and then moving the pipe to obtain better alignment elsewhere in the joint an acceptable construction practice?

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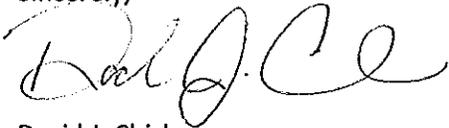
March 6, 2012

PHMSA

Request for Interpretation of 49 CFR § 192.235

2. Is the inclusion of a hinge or alignment tack into a finished weld which joint movement has taken place a violation of § 192.235?
3. Are hinge or alignment tacks an acceptable practice for establishing alignment, provided they are removed after the lineup clamp has been placed and adequate root bead has been deposited?

Sincerely,

A handwritten signature in black ink, appearing to read "David J. Chislea". The signature is fluid and cursive, with the first name "David" and last name "Chislea" clearly distinguishable.

David J. Chislea

Manager of Gas Operations

Michigan Public Service Commission