

PI-81-0106

May 7, 1981

Mr. N. L. Conrad  
Butler Associated, Inc.  
P.O. Box 45207  
Tulsa, OK 74145

Dear Mr. Conrad:

In response to your letter of April 27, 1981, regarding 49 CFR 195.212(b)(ii), I am enclosing a copy of a Federal Register Document published November 25, 1977 which clearly states that your second interpretation is correct.

Sincerely,

SIGNED

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

Butler  
P.O. Box 45207  
Tulsa, Oklahoma 74145

April 27, 1981  
475-81-001

U.S. Department of Transportation  
Research and Special Programs  
Administration  
Materials Transportation Bureau  
Washington, D.C. 20590

ATTENTION: Mr. F. S. Robinson

SUBJECT: Request for Interpretation of 195.212

Dear Sir:

We are writing to request an official interpretation of the following section of Part 195 - Transportation of Liquids by Pipeline:

195.212 Bending of Pipe

- (3) On the pipe containing a longitudinal weld the longitudinal weld must be as near as practicable to the neutral axis of the bend unless--
- (ii) the pipe is 12 inches or less in outside diameter or has a diameter to wall thickness ratio less than 70.

In (ii) we want to know if it can be interpreted to mean:

1. No concern for longitudinal weld position for pipe 12 inches and under unless the D/t ratio is greater than 70, but should place weld near neutral axis for all pipe larger than 12 inch.

OR

2. No concern for longitudinal weld position for pipe 12 inches and under. Also, no concern for any size pipe which has a D/t ratio of less than 70.

Which is the right interpretation?

We would appreciate a response at an early date.

Very truly yours,  
N.L.Conrad