



American
Petroleum
Institute

Via email: pipeline_interp_submittal@dot.gov

August 18, 2025

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

Re: Request for Regulatory Interpretation
Welding Procedure and Welder Qualifications using API Standard 1104

The American Petroleum Institute (API) is submitting this letter to request regulatory interpretations of several sections in 49 CFR §§ 192 and 195 as they pertain to API Standard 1104, *Welding of Pipelines and Related Facilities*, which is a long-standing consensus standard that is used extensively by the energy pipeline industry. API Standard 1104 (API 1104) is incorporated by reference (IBR) by US DOT in 49 CFR § 192.7(b)(9) and 49 CFR § 195(b)(19) for welding procedures, welder qualifications, and weld inspection. These requests for interpretation have been raised by the API Standard 1104 Committee.

US DOT PHMSA has IBR the 21st edition¹ of API 1104, however, the 22nd edition² is the most recently published version of the standard. Requalifying welding procedures and individual welders that were previously qualified to earlier editions of API 1104 that were IBR at the time of qualification is a central theme in the below questions and API's request for interpretation. A second theme is use of the 22nd edition on pipelines and facilities in the United States that are regulated under 49 CFR §§ 192 and 195. Since its publication in July 2021, the 22nd edition has seen increased use outside of the United States, but feedback from pipeline operating companies and contractors that provide welding services to those companies is that there are concerns with using the most current edition of the standard in the United States because it is not IBR.

The following questions are the result of feedback from pipeline operating company representatives and pipeline welding contractors, discussions within the API 1104 Committee,

¹ API Standard 1104, *Welding of Pipelines and Related Facilities*, 21st edition, September 2013, including Errata 1 through 5 (April 2014 through September 2018), Addendum 1 (2014), and Addendum 2 (2016)

² API Standard 1104, *Welding of Pipelines and Related Facilities*, 22nd edition, July 2021, Errata 1 (September 2023)

and engagement with US DOT PHMSA Engineers. On behalf of the API 1104 Committee, we would appreciate your response to the below questions with a Letter of Interpretation.

Welding Procedure Specification Qualification

- 1) When does a brand-new welding procedure specification (WPS) need to be qualified to the 21st edition? When does a brand-new WPS need to be qualified to the 22nd edition?
- 2) Can an operator continue to utilize an existing WPS qualified under prior editions of API 1104 that were IBR at the time of qualification, when a more recent edition of 1104 is IBR?
 - a) For example: an operator previously qualified a WPS to API 1104 20th edition when it was IBR and established their welding quality program based on 20th edition requirements. Now that the 21st edition is IBR, is the operator able to continue to utilize the previously qualified 20th edition procedures with no changes occurring to their procedures or welding quality program?
 - b) Is the operator able to continue to utilize the previously qualified 20th edition procedures while making changes to their welding quality program to reflect 21st edition requirements?
- 3) Can an existing WPS qualified under a previous edition be revised?
 - a) If so, does it need to be requalified to the 21st edition?
 - b) What if there is a revision(s) to the essential variables?
 - c) What if there are revisions to other variables, or editorial changes and clarifications?
- 4) What if a WPS was already under development under the 20th edition prior to January 1, 2025 – can welders continue to qualify to the 20th edition? What if the procedure was developed after January 1, 2025, because the governing design / contract documents were established on the 20th edition requirements?
- 5) In §§ 192.225 and 195.214, Section 5.4.2.2, NOTE 2 of the 21st edition was excluded by PHMSA when Section 5 of API 1104 was IBR. Why is this and which grade of pipe should be used?
 - a) NOTE 2 states “When base material with multiple grade markings is being used, the company designates, before using the material, the selected single grade to be used.”
- 6) Can an operator use the 22nd edition in lieu of the 21st edition before the 22nd edition is IBR?

- 7) Does PHMSA take any exception to an operator using a WPS that satisfies the requirements of:
- a) Both the 21st and 22nd edition?
 - b) Both the 20th and 21st edition?
 - c) For example, a procedure qualification record, or records, would be developed that meet the essential variables of the 20th and 21st edition (example a) or the 21st and 22nd edition (example b).
- 8) There are sections in the 21st edition that require updates to correct errors, but the 1104 Committee is not permitted by API to perform Standards Actions to correct previous editions of API 1104.
- a) API's 1104 Committee has an Interpretation Task Group that provides responses to interpretations requests submitted to API regarding API 1104. Will PHMSA accept the API 1104 Committee's Interpretation Task Group responses to the interpretation requests?
 - b) Alternatively, will PHMSA respond to Requests for Interpretations submitted to PHMSA on these sections to correct the errors?

Welder Qualification

- 1) When does a brand-new welder need to be qualified to the 21st edition?
- 2) Is a welder qualified under a previous edition of API 1104 that was IBR at the time of their qualification permitted to continue to weld without being requalified as a welder to the 21st edition so long as they have met welding continuity requirements [include reference for continuity 192.229 (d), 195.222 (a)]?
- 3) For the welder to maintain their qualification (§ 192.229 (b) and § 195.222 (b)) must they make a weld using a WPS qualified to the latest IBR edition?
- 4) Can a WPS qualified under a previous edition be used for welder qualification, or must all welders qualify using a WPS qualified to the latest IBR edition?
- 5) Can a welder that is qualified to the current IBR edition make welds using a WPS qualified to a previous edition of API 1104?
- 6) Can a welder qualify using a WPS that satisfies the requirements of both the 21st and 22nd edition?

API appreciates PHMSA's review of this request for regulatory interpretation related to API Standard 1104. If you have questions or would like to discuss this request in greater detail, please contact me.



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