



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

1200 New Jersey Avenue, SE  
Washington, DC 20590

October 05, 2022

Mr. Michael Kern  
Director, Gas Transmission Engineering and Design  
National Grid  
25 Hub Drive  
Melville, NY 11747

Dear Mr. Kern:

In a letter to the Pipeline and Hazardous Materials Safety Administration (PHMSA), dated August 16, 2022, you requested an interpretation of the Federal pipeline safety regulations in 49 Code of Federal Regulations (CFR) Part 192 with respect to what is acceptable for traceable, verifiable, and complete (TVC) documentation requirements of §§ 192.517(a) and 192.624(a) for onshore steel gas transmission pipelines.

You stated that National Grid operates and maintains transmission and distribution pipelines in the State of New York. You stated your request is pertaining to a PL E18 pipeline built in 1964 and that significant pipeline documentation exists in support of the pipeline's maximum allowable operating pressure (MAOP).

You believe the documents you possess, multiple and complementary formal written correspondence explicitly stating that a post construction pressure test was performed in accordance with existing New York State Pipeline Safety Regulations in effect at the time of installation, is enough to meet the TVC requirements. You stated, unfortunately, as of your interpretation request, actual pressure test chart records are not retrievable, and noted that charts were not required at the time of construction under the New York regulations. You listed five items as the complementary correspondence documents and attached the actual correspondence letters with your request but did not provide actual test data.

You stated that in the absence of the actual pressure test recording charts, you are seeking an interpretation regarding whether the New York State Public Service Commission can accept as evidence the official correspondence at the time of commissioning as proof of pressure test in fulfillment of the requirements of § 192.624(a)(1).

The applicable 49 CFR Part 192 section is reprinted below:

**§ 192.517 Records.**

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 are not generally applicable, do not create legally-enforceable rights or obligations, and are provided to help the specific requestor understand how to comply with the regulations.

(a) An operator must make, and retain for the useful life of the pipeline, a record of each test performed under §§ 192.505, 192.506, and 192.507. The record must contain at least the following information:

- (1) The operator's name, the name of the operator's employee responsible for making the test, and the name of any test company used.
- (2) Test medium used.
- (3) Test pressure.
- (4) Test duration.
- (5) Pressure recording charts, or other record of pressure readings.
- (6) Elevation variations, whenever significant for the particular test.
- (7) Leaks and failures noted and their disposition.

The § 192.517(a) records requirements are the minimum requirements for pressure tests to meet § 192.624(a). Therefore, TVC pressure test records (i.e., test pressure logs or charts or a pressure test summary log of the test) must contain the following supporting data:

- Name of person conducting the test and test being conducted by whom – operator or test company.
- Test medium used during the test.
- Location of the pipeline segment being tested by mile posts or survey stations that can be referenced to pipeline alignment or fabrication drawings.
- Time interval of the pressure test - Time, Day, Month, and Year.
- Minimum test pressure throughout the test duration. A pressure chart records pressure throughout the test, so a single test pressure does not support documentation throughout the test.
- Minimum test pressure must be supported by known elevation changes throughout the pressure test segment. If the elevations are unknown, the pipeline segment can be resurveyed for elevation variances to meet §§ 192.517(a) and 192.624(a).
- Documentation of any leaks or failures. If the log or chart does not show these as being found during the test, no additional documents are required.

To satisfy 49 CFR Part 192, Subpart J, pressure test records must also document the MAOP, class location, and that an 8-hour test duration was maintained. To meet § 192.624(a)(2), a pressure test segment must have material properties records required by § 192.624(c)(1)(ii) or (iii). A pressure test segment should be documented in a pipeline alignment drawing that shows the pipeline location, stationing, class location, pipe diameter, pipe wall thickness, pipe grade (minimum yield strength, ultimate tensile strength), pipe seam type, MAOP, and other attributes. To confirm that the test pressure meets the § 192.624(c)(1)(i) requirements for minimum test pressure, the operator is required to provide verification of the pipeline segment class location.

To satisfy § 192.624(a)(1), a pressure test segment that does not have material properties, must have material properties records obtained opportunistically to meet other sections of the regulations that require material records (i.e., §§ 192.712(d) and (e), 192.619(a)(4), 192.714(b), 192.929(b)(4)(i), and 192.933(a) as applicable).

Operators must ensure that TVC records meet the §§ 192.517(a), 192.619(a)(2), and 192.624(c)(1)(i) pressure test requirements, as applicable, or a new pressure test that meets both §§ 192.517(a) and 192.624(c)(1) with verification of material properties is required.

In this case, you did not provide test records. Without test records, correspondence letters whether official or not are not acceptable TVC records to meet the requirements of §§ 192.517(a) and 192.624(a) for an onshore steel gas transmission pipeline.

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

Sincerely,

John A. Gale  
Director, Office of Standards  
and Rulemaking



Michael Kern  
Director, Gas Transmission  
Engineering and Design  
8/16/2022

Mr. John A Gale  
Director, Office Standards and Rulemaking  
U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
1200 New Jersey Avenue, S.E.  
Washington, DC 20590

Dear Sir,

Niagara Mohawk Power Corporation d/b/a National Grid (“National Grid”) requests an interpretation of 49 Code of Federal Regulations (CFR) §192.624(a)(1), as applied to National Grid’s pipeline (“PL E18”) located in Albany and Saratoga, New York.

By way of background, National Grid is a local distribution company that owns, operates, and maintains transmission and distribution pipelines in the State of New York. National Grid is subject to the; pipeline safety rules and regulations promulgated by Pipeline and Hazardous Materials Safety Administration (“PHMSA”) and enforced by PHMSA’s delegated agency in New York – the Department of Public Service (“DPS”).

The subject pipeline, PL E18, was installed in 1964. Significant pipeline documentation exists in support of the declared maximum allowable operating pressure (“MAOP”); however, there remains a question regarding whether the documentation meets the intended definition of Traceable, Verifiable, and Complete (TVC) as provided in the Gas Rule FAQ #30 dated 1/30/2020.

Furthermore, the “Safety of Gas Transmission Pipelines: MAOP Reconfirmation, Expansion of Assessment Requirements, and Other Related Amendments” (RIN2137-AE72) [Docket No PHMSA-2011-0023; Amdt. Nos. 191-26; 192.125] does not define “traceable, verifiable, and complete”, but it discusses examples within the Preamble of the rule.

National Grid believes that the documentation currently available for this pipeline, as described below and attached hereto, (attached) provides sufficient support to prove that that PL E18 is traceable, verifiable and complete. In particular, National Grid is in possession of multiple and complementary formal written correspondence explicitly stating that a post construction pressure test was performed in accordance with existing New York State Pipeline Regulations in effect at the time of installation.<sup>1</sup> The correspondence clearly certify the MAOP of the newly commissioned pipeline with the State of New York and indicates that copies of all pressure recordings were officially transmitted to DPS as the state regulator. National Grid also believes and has documentation to show that the original charts were retained by the state inspector –

---

<sup>1</sup> The pipeline regulations are contained in 16 New York Codes, Rules and Regulations (NYCRR) Part 255.

as was the practice at that time. Unfortunately, as of this letter, actual pressure test chart records are not retrievable, and it should be noted that charts were not required at the time of construction under the governing regulation.

The complementary correspondence includes the following:

1. A post-construction letter to the New York State Public Service Commission, dated December 1, 1964, stating that the 16" and 20" gas transmission line between the town of Rotterdam, New York and Wilton, New York has been constructed and tested in accordance with the requirements and rules in place and certified to be in safe operating condition for service not to exceed 499 PSIG, with an operational start date of 11/23/64. It also states that photo copies are attached or were transmitted on November 2, 1964 showing all data, pressure charts, and results. This letter is signed by the officer of the Company, Mr. William Wood.
2. A certification letter dated November 11, 1964, certifying the Saratoga-Putnam Road Gas Pipeline 18, along with two sets of photostatic copies of the nine pressure and leakage charts.
3. A Niagara Mohawk internal correspondence dated June 13, 1989, from E. Quinlan to the company's P.L. E-18 file stating that the original test charts were kept by Francis Clonen, the PSC inspector, following the (pressure) test, as was standard practice with that inspector. This document would clearly explain why the original pressure test charts were not on file with Niagara Mohawk.
4. A letter to the New York State Public Service Commission and signed by M. H. Pratt, Vice President and Chief Engineer, dated November 12, 1964, notifying the New York State Public Service Commission that the 16" and 20" Gas Pipeline 18 transmission line from Wilton to Rotterdam was constructed and tested in accordance with the applicable requirements and rules in place and certified to be in safe operating condition for service not to exceed 499 PSIG.
5. A letter from the New York State Public Service Commission Gas Bureau to the Commission dated April 18, 1964 and approved by the Commission on May 5, 1964 stating that Niagara Mohawk Power Corporation has requested exceptions from two provisions of the gas transmission safety rules and regulations for Section 255.3, "Proscribed areas", and Section 255.5 "Pipelines under highways and railroads". The exceptions were granted, but of greater significance is that this letter provides documentation as to the TVC completeness of National Grid's documentation of MAOP verification of this pipeline. It specifies the design parameters of the pressure and leakage test of the pipeline. "A combined pressure and leakage test of the line is to be carried out hydrostatically at not less than 750 PSIG (150 percent of maximum operating pressure) for a maximum of 24 hours." It also provides details of the design of the pipeline. Although this document is pre-construction, it provides details regarding the intended test parameters and aligns with the post-construction documents that indicate that the pressure tests were performed in accordance with applicable requirements and rules.

In the absence of the actual pressure test recording charts, National Grid is seeking an interpretation regarding whether the DPS can accept as evidence the official correspondence at

the time of commissioning as proof of pressure test in fulfillment of the requirements of 49 CFR § 192.624(a)(1). National Grid respectfully requests that PHMSA provide clarification on this matter to facilitate a path forward for the Company and DPS with respect to the operation and maintenance of this pipeline and potentially limit the costs and environmental impact of requiring the Company to replace this 27-mile-long pipeline. Please contact me with any questions regarding this request. Thank you for your time and attention to this matter.

Sincerely,

Michael Kern P.E. (NY)  
Director, Gas Transmission Engineering & Design  
National Grid  
[michael.kern@nationalgrid.com](mailto:michael.kern@nationalgrid.com)