Mr. Charles F. Walton Technical Director Gray & Ductile Iron Founders' Society, Inc. National City - East Sixth Building Cleveland, Ohio 44114

Dear Mr. Walton:

This is in reply to your letter of November 9, 1970, requesting an interpretation of 49 CFR, Section 192.145. Specifically, you requested information as to whether, under the regulation, welding is permitted on ductile iron components in the manufacturing process when closely controlled metallurgical procedures are employed.

In answer to a similar request for interpretation we have replied as follows:

"Section 192.145 (c)(2) is taken directly from the B31.8, 1968, paragraph 831.11(b) and prohibits such welding."

We hope this answers your question. If you have further questions feel free to ask.

Sincerely,

/signed/

Joseph C. Caldwell Director, Acting Office of Pipeline Safety