Mr. E. B. Perrine Chief Engineer Rockwell Manufacturing Company Porterville Plant Porterville, California 93267

Dear Mr. Perrine:

This is in reply to your letter of December 7, 1970, requesting an interpretation of 49 CFR, Section 192.145(c)(2) regarding welding of ductile iron components.

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

If you have further questions do not hesitate to ask.

Sincerely,

/signed/

Joseph C. Caldwell Director, Acting Office Pipeline Safety