

Mr. R. M. Estes
ACF Industries, Inc.
W-K-M Valve Division
P.O. Box 2117
Houston, Texas 77001

Dear Mr. Estes:

This is in reply to your letter of July 13, 1971, requesting an interpretation as to whether or not certain sections of Part 192 pertain to valves.

Our reply is divided into four parts, with each part pertaining to one of the sections you mentioned.

1. 192.105 - Design Formula for Steel Pipe

Section 192.105 is contained in Subpart C titled, "Pipe Design." The Scope of Subpart C states, "This subpart prescribes the minimum requirements for the design of pipe." Subpart C and therefore Section 192.105 does not pertain to valves.

2. 192.143 - General Requirements

Section 192.143 is contained in Subpart D titled, "Design of Pipeline Components." The Scope of Subpart D states in part that the subpart, "prescribes minimum requirements for the design and installation of pipeline components and facilities." A valve is a pipeline component. Section 192.143 contains general requirements for all components and therefore does apply to valves.

3. 192.147 - Flanges and Flange Accessories

Section 192.147 is also located in Subpart D. There is no exception given in Section 192.147 for flanges that are integrally connected to a valve. Therefore, end flanges of valve must meet the requirements of Section 192.147.

4. 192.149 - Standard Fittings

The term "fittings" as used in Section 192.149 pertains to a component which is installed in a pipeline in place of pipe such as pipe ells and tees. Valves and flanges are not included since requirements for their design are located in Section 192.145 and Section 192.147. Valves, therefor, are not subject to the requirements of Section 102.149.

Please contact me if I can be of any further assistance in this matter.

Sincerely,

Joseph C. Caldwell
Acting Director
Office of Pipeline Safety