

PI-71-0118

October 5, 1971

Mr. Charles Turner, Product Engineer
Black, Silvalls & Bryson, Inc.
P.O. Box 1948
Oklahoma City, Oklahoma 73101

Dear *Mr.* Turner:

Your letter to our Houston office of August 27, 1971, has been forwarded to this office for reply. Taking your questions in order our answers are as follows:

1. Will A53 Grade B pipe as manufactured under ASTM 53-71 be approved as an acceptable material for fabricated tube bundle assemblies? Appendix B lists only ASTM 53-69.

Answer: It will be necessary for the Office of Pipeline Safety to continually update the listed specifications and standards as new editions become available and are found to be acceptable. Notification of such approval will be published in the Federal Register. Materials manufactured to meet specifications and standards that are a later edition than those listed in Appendix A, but that are certified by the manufacturer that they were manufactured in accordance with the requirements of the latest presently listed specifications, will be considered acceptable.

2. Will pipe less than 6 inches in diameter need to be non-destructively tested if operated above 40% SMYS? Refer to paragraph 192.241 (a) (1) and (b).

Answer: When pipe less than 6 inches nominal diameter is to be operated at a stress level of 40% SMYS or more, the welds are not required to be non-destructively tested if they are visually inspected and approved by a qualified welding inspector.

3. Does paragraph 192.63 mean that each tube and fitting in a tube bundle should have a permanent identification mark showing ASTM number and date of last approval? Please elaborate.

Answer: Section 192.63 marking of materials was amended effective November 12, 1970, and published in the Federal Register, Vol. 35, No. 223-Tuesday, November 17, 1970. The method of marking to comply with Section 192.63 is to be determined by the operator. The marking should be such that it remains clearly identifiable from point of manufacture to installation. Thus if the contents of the tube bundle are identifiable by marking the bundle the intent of the regulations is met. Where the requirements of MSS-SP-25 apply they should be followed.

We are enclosing one complete set of our current regulations with amendments. If we can be of further assistance, please let us know.

Sincerely,
Joseph C. Caldwell
Acting Director
Office of Pipeline Safety

Black Sivals & Bryson, Inc
BS&B Process Systems, Inc.
2131 Westwood Boulevard
P.O. Box 1948
Oklahoma City, OK 73101

August 27, 1971

Office of Pipeline Safety
201 Fannin
Room 315
Houston, Texas 77002

ATTENTION: Mr. Marshall W. Tayler II

Gentlemen:

Recently we contacted you via telephone asking you for interpretation of several paragraphs of the D.O.T. 192 Title 49 specifications. As you will remember the questions related to the fabrication of tube bundles in our Indirect Water Bath Gas Heaters. You indicated at that time that if we submitted these questions in letter form you could give or attain written opinions. This we are doing by copy of this letter.

The questions were as follows:

1. Will A53 Grade B pipe as manufactured under ASTM 53-71 be approved as an acceptable material for fabricated tube bundle assemblies? Appendix B list only ASTM 53-69.
2. Will pipe less than 6" in diameter need be non-destructively tested if operated above 40% SMYS? Refer to paragraph 192.241 (i) (a) and (b).
3. Does paragraph 192.63 mean that each tube and fitting in a tube bundle should have a permanent identification mark showing ASTM number and date of last approval? Please elaborate.

Please indicate where we can attain latest revisions to the D.O.T. specifications and specifically amendments to approved material in Appendix B. We shall anxiously await your reply.

Yours very truly,
BLACK, SIVALLS & BRYSON, INC.
Charles R. Turner Product Engineer