

PI-72-0118

December 22, 1972

Mr. Howard W. Berghegger  
Manager-Technical Services  
Sprague Meter Company  
35 South Avenue  
Bridgeport, Connecticut 06601

Dear Mr. Berghegger:

This is in reply to your letter of November 17, 1972, concerning constant loaded regulators which you manufacture. You ask for confirmation of your understanding that the inlet pressure line of such a regulator is not classed as a control line.

Section 192.197 (a) (6) of the federal regulations (49 CFR §192.197 (a) (6) states that where the maximum actual operating pressure of a distribution system is under 60 p.s.i.g., no other pressure limiting device is required if the system has a service regulator which, among other characteristics, is self-contained with no external static or control lines. You question now, in effect, whether the inlet pressure line connecting the two valve bodies of your constant loaded regulator would be acceptable under the regulation.

Your understanding is correct. Even though the inlet pressure line is a pilot supply line which may be necessary to the operation of the regulator, it is not classed as an external static or control line for purposes of §192.197(a)(6).

If we may be of further assists in this matter, please call on us.

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

Sprague Meter Company  
35 South Avenue  
Bridgeport, Connecticut 06601

November 17, 1972

Mr. Paul Cory  
Office of Pipeline Safety  
Department of Transportation  
Washington, D. C. 20590

Dear Mr. Cory:

During the Appalachian Gas Measurement Short Course in Morgantown, West Virginia last August, you told Mr. George Hughes that, in your opinion, D.O.T. did not consider the inlet pressure line connecting the two valve bodies of our CL (constant loaded) regulator as a pilot operated regulator control line.

Due to the various utility companies' interpretation of the code, many of our customers will not use the CL regulators, as they feel the line is classed as a "control line."

Attached is literature describing the CL-34, CL-31, and CL-231 regulators. Will you please review and give us a letter stating the function of the inlet pressure line is not classed as a pilot operated control line, if this is your decision.

Your cooperation and attention to this urgent matter will be greatly appreciated.

Sincerely,  
Howard W. Berghegger  
Manager – Technical Services