

PI-74-0147

December 03, 1974

Interpretations of Section 195.304
Testing of Components and Section 195.308
Testing of Tie-ins
Director, Office of Pipeline Safety

Chief, Houston Field Office

This refers to your office memorandum request for interpretations concerning a possible conflict between Section 195.304 and 195.308. You state that some operators are circumventing the requirement of hydrostatically testing replacement pipe by using the definition of "component" and a certification from the pipe mill to the effect that the pipe was hydrostatically tested at the mill.

The conflict has arisen because of the fact that various operators are alleging that "pipe" is a component and hence within the exemption for hydrostatic testing provided by Section 195.304(b) when it is accompanied by a certificate from the manufacturer stating that it was hydrostatically tested at the factory. When the conditions for the exemption of components under Section 195.304(b) are met, it is alleged that the provisions of Section 195.308 are no longer applicable.

Under no circumstance will a normal factory hydrostatic test of the pipe which lasts only a few seconds be sufficient to meet the requirement of Section 195.308. The same requirements for pressure and test duration applicable to a new pipeline under Section 195.302 are required for any segment of pipe added to a pipeline under Section 195.308. Section 195.308 specifically requires that "pipe associated with tie-ins must be hydrostatically tested." Even though Section 195.304(b) exempts certain pipe, as a component, from the field testing requirement, as a matter of proper language construction, the specific and more stringent safety requirement of Section 195.308 has precedence over the general, less stringent provision in Section 195.304(b).

Joseph C. Caldwell

United States Government
Department of Transportation
Office of the Secretary

Memorandum

Date: November 29, 1974

Subject: Definition of "pipe" and "components", section 195.2

From: G.S. Adams

To: Director, Office of Pipeline Safety

Attached is a suggested revision of your proposed memorandum interpreting 49 CFR sections 195.2, 195.304(b) and 195.308.

The existing definition of a "component" contained in section 195.302 is subject to being interpreted too broadly by members of the industry and the general public.

While the attached memorandum is intended to clarify our interpretation, the matter should be finally resolved by a revision of the definition provided in section 195.2. A similar ambiguity exists with regard to gas pipelines and Part 192, and it should likewise be clarified by the addition of a definition of the term "component". This would avoid any further confusion over the intended scope of Subparts C (Pipe Design) and Subpart D (Design of Pipeline Components).

G.S. Adams, TGC-20

United States Government
Department of Transportation
Office of the Secretary

Date: October 1, 1974

Subject: Interpretations: Liquid Pipelines

From: Staff Engineer
Houston Field Office

To: Chief, Technical Division (TES-32)

Re: Possible conflict between §195.304, Testing of Components, and §195.308, Testing of Tie-ins.

Some liquid pipeline operators acquire certification from the pipe mill to the effect that the pipe was hydrostatically tested at the mill. This certification coupled with the definition of "component" under §195.2 which by definition includes "pipe", is used to circumvent the requirement of hydrostatically testing the pipe in place or separately when a joint or short segment of pipe is used for replacement in an existing pipeline as per §195.308.

I would like an interpretation from your office as to under what conditions if any, a pipe mill test certification overrides the requirement of §195.308, because these operators contend that a mill test and certification are sufficient when pipe is the component being replaced. Until I get a definitive ruling on this I will have to keep possible compliance action in abeyance.

Jose L. de la Fuente