

February 10, 1978

Mr. Robert R. Young
The Standard Oil Company
Midland Building
Cleveland, Ohio 44115

Dear Mr. Young:

This responds to your letter dated November 18, 1977, in which you ask, "does the term 'cracks' as stated in DOT Section 195.230 and Section 195.232 exclude 'shallow crater cracks or star cracks' which are of acceptable dimensions and 'not considered injurious defects' according to Section [sic] 6.7 of API 1104 and DOT Section 195.228?" The answer is Yes, because the acceptability of a weld is determined according to the standards in Section 6 of the 1973 edition of API Standard 1104.

Section 6.7 of API 1104 states: "Shallow crater cracks or star cracks which are located at the stopping point of weld beads and which are the result of weld metal contraction during solidification are not considered injurious defects unless their length exceeds 5/32 inch. With exception of these shallow crater cracks, no weld containing cracks, regardless of size or location, shall be acceptable." The Office of Pipeline Safety Operations interpreted the requirement to mean that shallow crater cracks or star cracks 5/32 inch or less are not significant in the assessment of a weld. We believe that it would be incorrect to conclude that these specific cracks are identified in Section 195.230(a)(1) and Section 195.232(a), since they are not considered injurious defects.

We trust that we have satisfactorily responded to your inquiry.

Sincerely,

Cesar DeLeon
Acting Director
Office of Pipeline
Safety Operations

November 18, 1977

Mr. C. DeLeon, Acting Director
Department of Transportation
Office of Pipeline Safety Operations
2100 - 2nd Street, Southwest
Washington, DC 20590

Dear Mr. DeLeon:

This letter is a request from Standard Oil of Ohio for a ruling of interpretation from your department concerning API Standard 1104, Standard for Welding Pipelines and Related Facilities and DOT Part 195, Title 49, Code of Federal Regulations.

Section 6.7 (Nondestructive Testing) of API 1104 provides limits of acceptability for shallow crater cracks or star cracks, and states they are not considered injurious defects unless their length exceed 5/32 inch. DOT Section 195.228 states weld acceptability shall be determined according to Section 6 of API 1104, 1973 edition. DOT Sections 195.230 and 195.232 also discuss weld cracks and their relationship to acceptable weld repairs.

The question Standard Oil proposes and requests for your formal written interpretation is this:

Does the term "cracks" as stated in DOT Section 195.230 and Section 195.232 exclude "shallow crater cracks or star cracks" which are of acceptable dimensions and "not considered injurious defects" according to Section [sic] 6.7 of API 1104 and DOT Section 195.228?

Your interpretation of this question will be greatly appreciated.

Sincerely,

Robert R. Young