

March 16, 1979

Mr. John C. Wormeli, President
Alaska Welding Center
Quality Systems Incorporated
645 G Street, Suite 202
Anchorage, Alaska 99501

Dear Mr. Wormeli:

This responds to your request for an interpretation of 49 CFR 195.228 dated March 8, 1979. Your request was in two parts:

Question: The alternative which is to be followed when determining weld acceptability in the event that the pipe diameter is such that visual inspection of the root area is not possible as allowed in Paragraph (b)(1) of Section 195.228.

Answer: When depth of undercutting adjacent to the root bead is not visually determined by use of a depth measuring device as set forth in Section 195.228(b)(1), then only the length requirement of Subsection 6.9 of the 1973 edition of API Standard 1104 applies. The length requirement states that undercutting adjacent to the root bead shall not exceed 2 inches in length or 1/6 of the length of the weld, whichever is smaller.

Question: The alternative which is to be followed when determining weld acceptability in the event that tie-ins are not accessible for visual inspection.

Answer: The depth of undercutting adjacent to the root bead on a tie-in weld usually cannot be visually determined as set forth in Section 195.228(b)(1) because there is not (sic) way to enter the pipe, the tie-in weld being the final weld in a section.

Therefore, only the length requirement of Subsection 6.9 of the 1973 edition of API Standard 1104 applies.

I hope this answers your questions. Please contact me if I can be of any further assistance.

Sincerely,

\signed\

Cesar DeLeon
Associate Director for
Pipeline Safety Regulation
Materials Transportation Bureau