Subject: ACTION: Relocation of Pump

From: Melvin A. Judah
Acting Associate Director for Pipeline Safety Regulation, DMT-30

To: DMT-14

Your memorandum dated June 20, 1980, requested clarification of Section 195.304(b) concerning removal of a pump from a pipeline and subsequent use of that pump on the same pipeline or another pipeline. You questioned whether the pump must be hydrostatically tested before being returned to service.

Attached is an interpretation of Section 195.304(b) Which I hope will be helpful.

Attachment

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No. 80-16
Date: December 1, 1980

DEPARTMENT OF TRANSPORTATION

RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION

MATERIALS TRANSPORTATION BUREAU

PIPELINE SAFETY REGULATORY INTERPRETATION

Note: A pipeline safety regulatory interpretation applies a particular rule to a particular set of facts and circumstances, and, as such, may be relied upon only by those persons to whom the interpretation is specifically addressed.

SECTION: Section 195.304(b)

SUBJECT: Relocation of Pump

FACTS: A pump, which has been in service at one location on a pipeline system, is removed from service at that location, is overhauled and inspected, and is installed at another location on the same pipeline or another pipeline. The pump with related piping is the only item being installed. The pump was originally tested at the factory.

Questions: Must the pump be hydrostatically tested before being placed in service if the pump is (1) installed at another location on the same pipeline system, or (2) installed on another pipeline system?

Interpretation: Section 195.304(b) excepts a component from the hydrostatic testing requirement of Section 195.302 if the component is the only item

being replaced or added to a pipeline system and the manufacturer certifies that the component was hydrostatically tested at the factory or that a quality control system was used to ensure the strength of the component. In case (1) the pump is being added to the same pipeline system at another location, and in case (2) the pump is being added to another pipeline system. Further, in both cases, the pump has been hydrostatically tested at the factory. Therefore, in accordance with Section 195.304(b), if the appropriate manufacturer's certification has been made, the pump need not again be hydrostatically tested in either case.

The piping installed does not affect the application of Section 195.304(b) provided it is the auxiliary piping normally associated with pump installations and thus does not remove the installation from the concept that only a single component is being replaced or added. However, if the piping were pump suction and discharge lines with associated valved and by-pass, more than a single

component would be involved in the installation and Section 295.304(b) would not apply.

The fact that the pump was overhauled does not alter this interpretation as long as the overhaul involved only those items which normally wear on pumps, such as bearings, seals and impeller. If, however, welding or other repair work that could affect the strength of the pump case was performed, then a manufacturer's certification regarding original testing could not be relied on to predict future strength, and Section 195.304(b) would not apply.

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