

PI-82-0101

March 23, 1982

A. J. Schellenberg, P.E.
Gas Engineer, Lead Analyst
Wyoming Public Service Commission
Capitol Hill Building
320 W. 25th Street
Cheyenne, WY 82002

Dear Mr. Schellenberg:

This responds to your letter dated March 11, 1982, commenting on the reference to the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section VIII, in Part 195.

Judging from your comments, you apparently assume that reference specifications cited in section 195.3 apply to all sections of Part 195. Such is not the case. Reference specifications or sections of reference specifications apply only to those sections of Part 195 in which they are cited and only as cited. For example, the ASME Boiler and Pressure Vessel Code, Section VIII, is cited in section 195.124 and applies only to closures. Section 8 of API 1104 is cited in section 195.228(b) and applies only as cited there for a weld acceptance standard.

We hope this clarifies the use of reference specifications in Part 195. The ongoing effort of the Materials Transportation Bureau to state regulations in performance terms will solve future problems of misunderstanding the applicability of reference specifications.

Sincerely,
SIGNED
Melvin A. Judah
Acting Associate Director
for Pipeline Safety
Regulation Materials Transportation Bureau

CAPITOL HILL BUILDING
320 W. 25TH STREET
CHEYENNE, WYOMING 82002

March 11, 1982

Mr. Melvin A. Judah
Office of Pipeline Safety Regulation
Material Transportation Bureau
2100 Second Street S.W.
Washington, DC 20590

RE: Part 195 Reference technical specifications.

Dear Mr. Judah:

In reviewing Part 195, we find that you have ASME Section VIII listed as a reference technical specification. This specification requires the use of ASNE Section IX for the manual welding, and qualification of both the procedures and the welders.

You do list API 1104 as a welder and welding procedure technical specification, however, this is not an acceptable substitute for ASME Section IX.

I would recommend that this oversight be reviewed by your technical committees and added to Part 195 in order to have a viable document.

A change of this nature should not add any cost to the operators, but it still will provide them with an acceptable set of technical specifications.

Yours truly,
A. S. Schellenberg,
Gas Engineer, Lead Analyst