

May 19, 1983

Mr. Allan W. McKee
Petroleum Market Manager
The Duriron Company, Inc. - Valve Division
P.O. Box 2609
Cookeville, TN 38502-2609

Dear Mr. McKee:

Enclosed is an interpretation of 49 CFR §192.363(b) as requested by your letter to this Office of April 26, 1983.

We hope this answers your question adequately.

Sincerely,

Richard L. Beam
Associate Director for
Pipeline Safety Regulation
Materials Transportation Bureau

Enclosure

DEPARTMENT OF TRANSPORTATION
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION
MATERIALS TRANSPORTATION BUREAU

PIPELINE SAFETY REGULATORY INTERPRETATION

Note: This pipeline safety regulatory interpretation applies to all operators that are subject to the rule under Federal or State law.

SECTION: 192.363(b), Service lines: Valve requirements.

SUBJECT: Use of soft-seated valves.

FACTS: §192.363(b) says, "A soft seat service line valve may not be used if its ability to control the flow of gas could be adversely affected by exposure to anticipated heat."

QUESTION: Does "anticipated heat" refer to a possible fire, or simply hot gas flowing under normal operating conditions?

INTERPRETATION: "Anticipated heat" refers to any possible source of heat to which a valve may be exposed, including fire, that would make the valve inoperable. The primary industry standard that has been used to demonstrate the fire resistance of valves is "Fire Test for Soft-Seated Ball Valves," API 607.

Richard L. Beam
Associate Director for
Pipeline Safety Regulation
Materials Transportation Bureau

April 26, 1983

Mr. Richard Beam
Assoc. Director, Pipeline Safety Regulations
Materials Transportation Bureau
Dept. of Transportation
Washington, DC 20590

Dear Mr. Beam:

Our company is a manufacturer of non-lubricated plug valves. We have, in the past two years, begun marketing these valves in the gas distribution industry on a wide variety of applications.

Recently, one of our sales engineers was visiting with a prospective gas utility client who called our attention to Title 49, Federal Code, Para. 192.363, subparagraph (b), which indicates that soft-seated valves should not be in a service line if the valve's performance would be affected by anticipated heat.

Our prospective client claims he cannot use our product because the soft seat "may be destroyed in a fire." My question is to clarify the phrase, "anticipated heat." Is this spec referring to a fire, or simply hot gas flowing under normal operating conditions? Please send a written clarification of this spec to:

Allan W. McKee - Petroleum Market Mgr.
The Duriron Co., Inc. - Valve Division
P.O. Box 2609
Cookeville, TN 38502-2609

49 CFR Part 192

[Interpretation 83-6]

Transportation of Natural and Other Gas by Pipeline; Service Line Valve Requirements

AGENCY: Materials Transportation Bureau (MTB), Research and Special Programs Administration, DOT.

ACTION: Interpretation.

SUMMARY: The Research and Special Programs Administration (RSPA) is issuing this interpretation, of the term "Anticipated heat" as it appears in paragraph (b) of §192.363, Service line valve requirements. The interpretation was requested by a pipeline valve manufacturer. This interpretation clarifies the intent of the term "anticipated heat" and the appropriateness of certain tests used to determine that a valve does or does not comply with §192.363(b).

EFFECTIVE DATE: August 22, 1983.

FOR FURTHER INFORMATION CONTACT:

Paul J. Cory, (202) 426-2082.

SUPPLEMENTARY INFORMATION:

Interpretation 83-6.

Section: §192.363(b).

Subject: Use of soft-seated valves.

Facts: Section 192.363(b) says, "A soft seat service line valve may not be used if its ability to control the flow of gas could be adversely affected by exposure to anticipated heat."

Question: Does "anticipated heat" refer to a possible fire, or simply hot gas flowing under normal *operating* conditions?

Interpretation: "Anticipated heat" refers to any possible source of heat to which a valve may be exposed, including fire, that would make the valve inoperable. The primary industry standard that has been used to demonstrate the fire resistance of valves is "Fire Test for Soft-Seated Ball Valves." API 607.

List of Subjects in 49 CFR Part 192

Pipeline Safety.

(49 U.S.C. 1672 and 1804; 49 CFR 1.53, Appendix A to Part 1, and Appendix A to Part 106)

Issued in Washington, D.C. on May 19, 1983.

Richard L. Beam,

*Associate Director for Pipeline Safety
Regulation, Materials Transportation Bureau.*