

February 4, 1994

Mr. John S. Dayton  
Senior Vice President  
Operations and Engineering  
Alyeska Pipeline Service Company  
1835 South Bragaw Street  
Anchorage, Alaska 99512

Dear Mr. Dayton:

This responds to your two letters dated December 28, 1993, regarding the Department's pipeline safety regulations. The first letter concerns application of the regulations in 49 CFR Part 192 to Alyeska's fuel gas line, and the second concerns pipe movement under 49 CFR 195.424(a).

You asked us to interpret Part 192 to exclude certain portions of Alyeska's fuel gas line. By letter of August 31, 1993, Edward J. Ondak, Director of the Western Regional Pipeline Safety Office, advised you of the jurisdiction of Part 192 over the fuel gas line. That letter (copy enclosed), which represents this agency's position on the matter, states that certain piping is excluded from Part 192.

You also asked us to interpret § 195.424(a) to exclude small movements of pipe associated with certain operation and maintenance activities, including the restoration of pipe to its original position. Section 195.424(a) states: "No operator may move any line pipe, unless the pressure in the line section involved is reduced to not more than 50 percent of the maximum operating pressure." The plain meaning and history of this rule would not support an interpretation that small movements are excluded from the rule. However, § 195.424(a) does not apply unless an operator moves pipe as a necessary step in a maintenance activity. Thus, the rule applies, for example, when pipe is lowered to accommodate a road crossing, and when displaced pipe is moved back into its original position. But the rule does not apply to movement that results from operating pressure or temperature fluctuations, because such movement is not part of a maintenance activity. Also, the rule does not apply to movement that is incidental to pipeline repair, such as movement that occurs when temporary pipe support is added or removed, or when pipe strain is relieved by excavation. Movements such as these are not a necessary part of the repair procedure.

Please let me know if I can provide any further information.

Sincerely,

Cesar De Leon  
Director, Office of Pipeline Safety  
Regulatory Programs

Enclosure