

Mr. Robert V. Warrick
Executive Secretary
Manufacturers Standardization Society
of the Valve & Fittings Industry
1815 North Fort Myer Drive
Arlington, Virginia 22209

Dear Mr. Warrick:

This is in reply to your request for an interpretation of 49 CFR, Section 192.149 concerning the requirements for butt-welding fittings. You ask if there is compliance with the requirements of Section 192.149(b) if -

- (1) Manufacturers will certify that prototype burst testing has been done to establish lines of fittings and
- (2) Manufacturers will document field test experience on fittings representative of size, thickness and material strength to a pressure as high as required for the pipeline to which it is being added.

The first sentence of Section 192.149(b) is taken from the ANSI B31.8 Code, Section 831.31(b) except that the Code references to ANSI B16.9, MSS SP-48 and MSS SP-63 have been omitted. The second sentence of Section 1-2.140 is a restatement of the requirements for a bursting strength test as provided for by ANSI B16.9 paragraph 8 by MSS SP-48 paragraph 8.

The practice described in your letter meet the requirements of Section 192.149(b) provided that the steel butt-welding fittings being tested also have temperature ratings based on stresses for pipe of the same or equivalent material.

If we can be of further assistance, please do not hesitate to ask.

Sincerely,

Joseph C. Caldwell
Director, Acting
Office of Pipeline Safety

Mr. Joseph Caldwell
Acting Director
Office Pipeline Safety
Office of the Secretary of Transportation
400-6th Avenue
Washington, D. C.

Subject: Request for Interpretation of Regulations

Dear Mr. Caldwell:

Manufacturers of Butt Welding Fittings belonging to this organization, have reviewed the recently issued regulations pertaining to safety in gas pipelines and regret that the proposed wording of paragraph 192.149(b), may be misinterpreted. Accordingly, it would be appreciated if an interpretation of this paragraph can be received. We wonder if conformance to the regulation will be accomplished if the following criteria are observed: (1) Manufacturer will certify that prototype burst testing has been done to establish lines of fittings. (2) Manufacturer will document field test experience on fittings representative of size, thickness and material strength to a pressure as high as that required for the pipeline to which it is being added.

It is believed that this is a reasonable statement of the practice of manufacturers supplying welding fittings for existing pipelines and whose products have provided safe service for a substantial number of years. We would appreciate your opinion of this proposal.

Very truly yours,

Robert V. Warrick
Executive Secretary