

Mr. P. G. Mulligan
Superintendent, Gas Distribution
Philadelphia Electric Company
1000 Chestnut Street
Philadelphia, Pennsylvania 19105

Dear Mr. Mulligan:

This is in reply to your letter of March 16, 1971. concerning testing requirements for plastic service line, 49 CFR, Section 192.513.

We are aware that a plastic pipeline operating at a pressure of 100 psig requires a higher test pressure than would a steel main operating at the same pressure. The question was carefully considered during the drafting of the Minimum Federal Safety Standards for Natural and Other Gas. The more stringent requirements were adopted for plastic because from a safety point of view a lesser test on plastic pipelines could not be justified, particularly since the construction requirements for plastic were not nearly so extensive as for steel (welding specifications, qualifications of welders, material specifications, length of experience, etc).

If we can be of any further assistance, please let us know.

Sincerely,

/signed/

Joseph C. Caldwell
Acting Director
Office of Pipeline Safety