

PI-71-0115

Mr. Del Moore, Chief Engineer
Charles Wheatley Company
911 South Main Street
Tulsa, Oklahoma 74119

Dear Mr. Moore:

This refers to your letter of June 7, 1971 and our reply of June 18, 1971, concerning certain aspects of the liquid pipeline regulations, particularly Section 195.426.

The main purpose of Section 195.426 is to minimize the opening of end closures on scraper and sphere facilities while the facility is subjected to pressure, and thereby reducing the possibility of injury to personnel removing the end closure. There are two requirements contained in Section 195.426. One requirement is that the barrel in which the scraper or sphere is inserted or removed contains a relief device, such as a blowoff, which can be used to relieve pressure on the barrel prior to opening the end closure on the barrel. The second requirement is that the end closure itself must contain a device to either prevent the closure from being removed prior to release of the pressure on the barrel or to indicate that pressure still remains on the barrel. The "lock and bleed" device on Yale closures and the "pressure warning device" on Tube Turn closures satisfy the second requirement mentioned above.

You raised the question in your June 7, 1971 letter, as to whether the above mentioned devices would satisfy the "relief valve feature" of the regulation. Section 195.426 contains the term "relief device" but not the term "relief valve." You might have been thinking of a device that would relieve pressure in the barrel automatically if it become as high as the preset valve on the relief valve. Section 195.426 contains no such requirement.

The information that you recently provided to this department, revealed that the scraper and sphere facilities designed by your firm include a blowoff device, as previously mentioned, in addition to the "lock and bleed" device. This indicates that the Charles Wheatly Company is fulfilling the requirements of Section 195.426 in design of scraper and sphere equipment.

Sincerely yours,
Mac E. Rogers
Director
Bureau of Railroad Safety

United States Government
Department of Transportation
Federal Railroad Administration

Memorandum

June 23, 1971

TO: Joseph C. Caldwell, Acting Director
Office of Pipeline Safety

FROM: Director,
Bureau of Railroad Safety

SUBJECT: Request for Technical Advice,
Section 195.426
Transportation of Liquids by Pipeline

Attached is a copy of a letter recently received from Mr. Del Moore, Chief Engineer of the Charles Wheatley Company which manufactures various fittings for pipelines. The fourth paragraph of the letter raises a question as to the meaning of Section 195.426 of the regulations. Your advice on the question raised by Mr. Moore would be greatly appreciated.

Mac E. Rogers

Charles Wheatley Company
911 South Main Street
Tulsa, Oklahoma 74119

June 7, 1971

Department of Transportation
Federal Railroad Administration
Washington D.C. 20691

Attention: Mr. Mac E. Rogers :
Director
Bureau of Railroad Safety

Dear Mr. Rogers:

We have received the Department of Transportation Specifications and wish to thank you and your Office for your cooperation.

In discussing the D.O.T. Specifications within our own company, we were wondering about several points. As stated under 195.1, page two, these specifications apply only to pipelines transporting hazardous liquids and therefore are not applicable to "natural and artificial gas" as your document goes on to say that these gaseous materials are covered by the Natural Gas Pipeline Safety Act of 1968, reference portions 172 and 173.

Could we again impose upon you in that we would appreciate two copies of the Natural Gas Pipeline Safety Act also?

One other question, sub-paragraph 105.426, page 10, regarding the relief valve feature on scraper or sphere traps. We sometimes manufacture traps and were wondering if this requirement can be satisfied with the built-in safety feature furnished on closures, for instance, Yale Manufacturing calls theirs "Lock and Bleed", Tube Turn refers to theirs as "Pressure Warning Device". If these do not meet the requirements of 195.426, could you then advise what type of relief feature is meant by this paragraph.

We appreciate your help and will await your reply.

Yours very truly,
CHARLES WHEATLEY COMPANY
Del Moore
Chief Engineer

June 22, 1971

Mr. Del Moore, Chief Engineer
Charles Wheatley Company
911 South Main Street
Tulsa, Oklahoma 74119

Dear Mr. Moore:

This refers to your letter of June 7, 1971, concerning the gas and liquid pipeline safety regulations.

Two copies of the Natural gas Pipeline Safety Act of 1968, and the regulations promulgated under provisions of the Act, have been sent to you under separate cover.

With regard to an interpretation of section 195.426 of the liquid pipeline regulations, the matter will be studied by my staff. Upon completion of the study you will be advised of our views on the scraper trap relief feature.

Sincerely yours,
J.U. Chrisman
Mac E. Rogers
Director
Bureau of Railroad Safety