

PI-71-0120

December 15, 1971

Mr. R. D Wilkins, Manager  
Applications Engineering  
Engineering and Research  
ACF Industries  
P.O. Box 2117  
Houston, Texas 77001

Dear Mr. Wilkins:

Thank you for your letter of November 22, 1971, that inquired about the interpretation of 49 CFR §§192.505 (c) and (d).

You are correct in your understanding that in the very limited circumstances delineated in §192.505 (d) the requirements for a strength test and for maintaining test pressure for eight hours is not required. Thus, if a component other than pipe is the only item being replaced or added to a pipeline, a strength test after installation is not required, if the manufacturer of the component certifies that (1) the component was tested to at least the pressure required for the pipeline to which the component is being added, or (2) the component was manufactured under a quality control system that ensures that each item manufactured is at least equal in strength to a prototype and that the prototype was tested to at least the pressure required for the pipeline to which it is being added.

The reason for this exception is that if the manufacturer meets either of the requirements of §192.505 (d) an equivalent level of safety to §192.505 (c) is maintained without the burden of the eight hour test.

We trust that this will satisfactorily clarify the regulations for you.

Sincerely,  
Original signed by:  
Joseph C. Caldwell  
Acting Director  
Office of Pipeline Safety

ACF Industries  
P.O. Box 2117  
Houston, Texas 77001

November 22, 1971

Mr. Joseph C. Caldwell  
Acting Director  
Office of Pipeline Safety  
Department of Transportation  
400 Sixth St. S.W.  
Washington, D. C. 20590

Dear Mr. Caldwell:

We would like to request an interpretation of Paragraph 192.505 of Title 49, Code of Federal Regulations.

In Subparagraph (c) of Paragraph 192.505, an eight hour system strength test is required for a pipeline operating above 30% of pipe SMYS.

In Subparagraph (d), it is stated that a strength test of this pipeline is not required if a component manufacturer certifies that the valve was tested to at least the pressure required for the pipeline in which this component will be installed.

From the way the Paragraph is phrased, we are able to interpret that the eight hour test duration is not required by the wording of Subparagraph (d).

Since this interpretation is literal, we ask that you verify this interpretation so that we may be also assured of the intent of the paragraph.

Very truly yours,  
R. D. Wilkins  
Manager –  
Applications Engineering  
Engineering & Research