

July 21, 1972

Re your telephone conversation with
Mr. Stockton on April 10, 1972

Operation and Compliance Officer

Chief, Technical Division, TSA-32

The statement "In the event of a conflict (between Part 192 and a referenced specification), the requirements of this part prevail" means that in the event of a conflict between the referenced specification and Part 192, the requirements of Part 192 will take precedence.

The term "conflict" means an inconsistency between Part 192 and the referenced specification - where Part 192 requires to do one thing and the referenced specification requires to do something else. This should not be construed to mean that there is a conflict if either Part 192 or the referenced specification is silent on any particular matter. If either Part 192 or the referenced specification requires or prohibits an action and the other regulation is silent on the subject, this requirement or prohibition will hold. Similarly, if either of the regulations require an action and the other regulation permits another action, the requirement will prevail.

Therefore, your conclusion is correct on the requirement for using wrought iron, steel, brass, copper, or aluminum alloy pipe as required by NFPA 58 takes precedence over the requirement permitting the use of plastic pipe in Part 192.

Cesar DeLeon, TSA-36