

Mr. Charles H. Batten  
Utilities Safety Engineer  
Florida Public Service Commission  
700 South Adams Street  
Tallahassee, Florida 32304

Dear Mr. Batten:

We are sorry we failed to give further response to your letter of December 8, 1971. We hope that this delay has not inconvenienced your office in any way.

Your specific questions were:

2. In applying the definitions of "main" and "service line" as contained in Paragraph 192.3 of Subpart A, would a pipeline running from a main in the street onto private property and serving a duplex with individual meters be considered as a main or service line?

Answer: Such a line would be considered a service line and is usually referred to as split services or branch services.

3. How would a company comply with the provisions of Paragraph 192.229(c) when their welders are qualified under Section 3 of API Standards 1104 by passing the multiple qualification test. Would a production weld have to be cut out of a butt weld joint and a branch weld joint or would one or the other suffice?

Answer: For welders qualified to make both butt and fillet welds by the multiple qualification of API Standards 1104, either type of weld can be destructively tested to comply with Section 192.229(c) since only one weld is required to be tested. However, a butt weld does not have to be destructively tested to comply with Section 192.229(c) if it is nondestructively tested and found acceptable under Section 6 of API Standards 1104.

4. In Subparagraph (1) under the definition of "transmission line" as found in Paragraph 192.3, would the term "storage facility" be defined to mean only pipe type and bottle type holders or would this include storage in a natural underground cavity a well a low pressure system holders.

Answer: The term "storage facility" in the definition of transmission line" includes storage in a natural underground cavity. A low pressure holder would also be considered as a "storage facility."

We trust that this has answered your specific questions. If we can be of further service, please let us know.

Sincerely,

/signed/

Joseph C. Caldwell, Director