

Mr. B. H. Clements  
Alemda Welding & Inspection Company  
P. O. Box 45872  
Houston, Texas 77045

Dear Mr. Clements:

Your letter of July 2, 1973, addressed to our Houston Office has been refereed to this Office for reply. By it you forwarded a letter form the Mechanical Design and Fabrication Subgroup of the ASME asking whether the phrase "is determined" in §192.105(a) makes the section mandatory.

In pertinent part, §192.105(a) reads: "The design pressure for steel pipe is determined in accordance with the following formula: . . . ." As with the definitions in §192.3, the words "shall" or "must" need not appear to make the paragraph regulatory in nature. The words in question are used in the expository sense and the paragraph is definitional in nature. For clarity and organization the requirement was placed in Subpart C, but it could have been in §192.3 where as a definition it would have read: "Design pressure for steel pipe means that pressure determined in accordance with the following formula:...."

As stated in §192.101, Subpart C prescribes minimum requirements for the design of pipe. If the formula of §192.105(a) is not used, the requirements are not being met. Whenever design pressure for steel pipe must be calculated for use in connection with any of the Federal gas pipeline safety standards, it must be determined as a regulatory matter in accordance with the formula given in §192.105(a). Any substitution of expressions which are at variance with those given in the formula will not result in values for design pressure which can be used for purposes of the regulations.

If you have further questions, please call on us.

Sincerely,

/signed/

Joseph C. Caldwell  
Director  
Office of Pipeline Safety