

Mr. J. J. Crudup
Utilities Engineer
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334

Dear Mr. Crudup:

This responds to your letter of December 1973, requesting an interpretation of Section 192.181(c)(1). Your letter states:

"Part 192.181(c)(1) states that each valve on a main installed for operating or emergency purposes must be placed in a readily accessible location so as to facilitate its operation in an emergency. Does this require the operator to bring all such valve stems up to grade through standpipes, or by similar manner?"

The intent of the requirement is to provide for the quick and easy operation of a valve installed for operating or emergency purposes on a main. The employees of a gas operator should be able to close such a valve within minutes after arriving at the valve site. If, for instance, a valve is buried and time must be spent to locate it and then remove the paving and backfill in order to operate it, the requirement of Section 192.181(c)(1) has not been met.

An operator can comply with the requirement by bringing the valve stem up to grade in a standpipe, as you suggest, or by operating the valve at the level of burial through a standpipe by using a portable extension. Other methods may also be employed. The operator or designer of the system who has experience and familiarity with local conditions should be able to determine the best procedure to use.

You also asked if we had considered the degree of accessibility as a function of class location. There was no such consideration when the regulations was adopted. Section 192.181(c)(1) is based on a comparable provision in the 1968 edition of the American National Standard Code for Pressure Piping, Gas Transmission and Distribution Piping Systems, B31.8, which does not classify accessibility o by location. This code was used by the gas industry on a voluntary basis prior to issuance of the Federal Gas Safety Standards.

I hope this answers your questions fully, If we can be of any further assistance, please contact us.

Sincerely,

/signed/

Joseph C. Caldwell, Director
Office of Pipeline Safety