PI-73-0113

July 6, 1973

Mr. Howard W. Berghegger
Manager, Technical Services
Sprague Meter Company
Bridgeport, Connecticut 06601

Dear Mr. Berghegger:

Your letter of June 21, 1973, asks whether the internal relief valve of a high pressure regulator qualifies as the pressure limiting device required by §192.197 (c) (1) of the Federal gas pipeline safety standards when the high pressure regulator is used as the first stage regulator in a two stage application.

Section 192.197 (c) (1) states in pertinent parts: "A device must be installed between the upstream regulator and the service regulator to limit the pressure on the inlet of the service regulator to 60 p.s.i.g. or less in case the upstream regulator fails to function properly. This device may be either a relief valve or an automatic shutoff…"

If a relief valve is used, §192.197 does not specify whether it is to be internal or external. The purpose of the rule is to require a certain level of overpressure protection for the inlet to the service regulator. However, it is not the intent to specify how that level is to be attained. If the internal relief valve in a first cut regulator limits the inlet pressure on the service regulator as required, then it meets the rule and an external relief valve is not required.

If we may be of further assistance in this matter, please call on us.

Sincerely,
Joseph C. Caldwell
Director
Office of pipeline safety

Sprague Meter Company
Bridgeport, Connecticut 06601

June 21, 1973

Mr. Joseph C. Caldwell, Director
Office of Pipeline Safety
Office of the Secretary of Transportation
Washington, D. C. 20590

Re: Federal Regulations 49, CFR, Paragraph 192.197 (c)(1)

Dear Mr. Caldwell:

We have been requested by a customer to obtain from you a clarification of the Sprague B35R(high pressure regulator with internal relief) used as a first stage regulator in a two stage application.

The subject paragraph states: " A device must be installed between the upstream regulator and the service regulator to limit the pressure on the inlet of the service regulator to 60 psig, or less in case of the upstream regulator fails to function properly. This device may be either a relief valve or an automatic shutoff that shuts... etc."

The customer is interpreting the statement as requiring an external relief valve. Our contention is the" device" is satisfied to meet the code by the internal relief valve in the B35R regulator.

Attached are several B35 Regulator catalog sheets for your review. If further information is required please do not hesitate to contact me and we will look forward to your earliest reply.

Very truly yours,
Howard W. Berghegger
Manager, Technical Services