

Mar 11 1974

Mr. John Searcy
Engineering Division
Tennessee Public Service Commission
Cordell Hull Building
Nashville, TN 37219

Dear Mr. Searcy:

This is in response to your letter of February 22, 1974, regarding an Office of Pipeline Safety interpretation of 49 CFR 192.63 which states that "The intent of the regulation is that the product be clearly identified from point of manufacture to installation. In general, a marking on a package would not serve to identify a product out of the package prior to installation."

You point out that Section 11.1b of API Standard 5L, 1970 allows bundle marking of pipe in sizes 1.900 inch OD and smaller, which does not meet the intent of the regulation if individual pipe lengths are removed from a bundle and installed separately. Then, you ask whether the intent of §192.63 prevails over Section 11.1b of API Standard 5L to require marking of individual lengths of pipe removed from a bundle and installed separately.

Under §192.63, pipe must be clearly identified from point of manufacture to installation. In the case of bundle marked pipe, this requirements is satisfied where the bundle is used at a single installation. However, if lengths of pipe are taken out of the bundle and used at separate installations, each length removed must be marked exclusive of the bundle marking to comply with the requirement.

We trust that this has answered your particular question.

Sincerely,

Joseph C. Caldwell
Director
Office of Pipeline Safety