

PI-74-0145

November 6, 1974

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

Dear Mr. Searcy:

This refers to your letter of October 2, 1974, in which you ask whether an entire distribution system is a district for the purpose of 49 CFR 192.741(a).

This rule provides:

- (a) "Each distribution system supplied by more than one district pressure regulating station must be equipped with telemetering or recording pressure gages to indicate the gas pressure in the district."

Section 102.741(a) applies where two or more district pressure regulators are used in supplying gas to a distribution system downstream from the regulators. In this case, the distribution system comprises two or more districts served by the regulators; and the system must be equipped with telemetering or recording pressure gages to show the gas pressure in each district.

In answer to your other questions, first it is not mandatory that an operator include material which we present in industry seminars in an operating and maintenance plan under section 192.603(b). The material is presented merely as a guide to operators. Secondly, where a single operator and maintenance plan may suffice for running all of the systems. However, any peculiarities in a system must be covered as required by Part 192 in the operator's plan, either in the single plan or in a separate plan.

Sincerely,

Joseph C. Caldwell  
Director  
Office of Pipeline Safety

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October 2, 1974

Mr. Joseph C. Caldwell, Director  
Office of Pipeline Safety  
Department of Transportation  
2100 Second Street, SW  
Washington, D.C. 20590

Dear Mr. Caldwell:

192.741(a) requires that "Each distribution system supplied by more than one (1) district pressure regulating station . . . be equipped with telemetering or recording pressure gauges..." this implies that an entire distribution system is a district for the purpose of this regulation. Is this a correct interpretation?

192.603(b) requires a written operating and maintenance plan and that records be kept to administer the plan. The material used for the DOT Industry Seminar on Safety Requirements outlines on Page 20, Unit B-5, Paragraph 1.d., eight (8) items which the plan should include. It is a correct interpretation that it is mandatory that these items, particularly odorization equipment, be included in an operation and maintenance plan? Where one (1) utility operates gas systems in more than one (1) city or town, are operation and maintenance plans and records required at each system?

Sincerely,

John Searcy  
Engineering Division