

May 1, 1975

Mr. Robert Buss
Ball Engineering Company
Consulting Engineers
Centerville, Iowa

Dear Mr. Buss:

This responds to your letter of March 22, 1975, asking several questions regarding 49 CFR Part 192.

Question 1: Does the exception from the requirement for non-destructive testing of welds under Section 192.241(b) for pipe less than 6 inches in nominal diameter also apply to field girth butt welds which must be tested under Section 192.719(a)(2)?

Answer: Section 192.241(b) provides limited exceptions from the requirement that all welds on newly installed, replaced, or relocated pipe to be operated at 20 percent or more of SMYS, be non-destructively tested. In contrast, Section 192.719(a)(2) specifically requires strength or non-destructive testing for field girth butt welds made in repairing a transmission line by cutting out damaged pipe as a cylinder and replacing it. This specific requirements for testing a repair weld was established without exception because of the greater need to ensure weld quality.

Question 2: Does Section 192.503(d) refer to pressure testing only of welds?

Answer: Section 192.503(d) provides that the leak and strength test requirements for pipelines under Subpart J do not apply to welds used to tie-in a segment of pipeline being tested.

Question 3: Does a pressure test made on replacement pipe before it is installed, as permitted by Section 192.719(a)(2), satisfy the requirement of Section 192.619(a)(2)(ii) that in establishing a maximum allowable operating pressure for certain pipe, a pressure test be made "after construction?"

Answer: Because the requirements of Sections 192.619(a)(2)(ii) and 192.719(a)(2) apply in conjunction, a pressure test permitted by Section 192.719(a)(2) to be made before installation must necessarily qualify as the test required by Section 192.619(a)(2)(ii). At the same time, Section 192.719(a)(2)

provides that any field girth butt weld which is not strength tested in the pre-installation testing process must be non-destructively tested after installation in accordance with Section 192.243.

As you requested, we have enclosed a copy of Advisory Bulletin No. 74-7.

Thank you for your interest in pipeline safety.

Sincerely,

Joseph C. Caldwell
Director
Office of Pipeline Safety

Enclosure