

Jan 28 1976

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

Dear Mr. Searcy:

The following responds to the questions in your letter of January 2, 1976:

Question 1: Is it a correct interpretation that a welder qualified initially under 192.227(a) in accordance with the 1968 ASME Boiler and Pressure Vessel Code, Section IX is, in effect, required by 192.229(c) to re-qualify after 6 months in accordance with API 1104 only, not Section IX?

Answer: A welder qualified under Section IX of the 1968 edition of the ASME Boiler and Pressure Vessel Code in accordance with §192.227(a) may not weld unless, within the preceding six calendar months, that welder has had at least one weld tested and found acceptable under Section 3 or 6 of API Standard 1104, as required by §192.229(c). Section 192.229(c) does not require that the welder requalify under API 1104.

Question 2: If the interpretation in Question 1 is correct, can a welder, after 6 months, initially qualify again in accordance with Section IX?

Answer: Although your interpretation in Question 1 is incorrect, if a welder requalifies under Section IX within six months, §192.229(c) would not apply.

Question 3: Is a welder qualified in accordance with 192.227(a) automatically qualified for a year in accordance with 192.227(c) for pipe operating at less than 20% SMYS?

Answer: As prescribed by §192.229(c), a welder who qualifies under §192.227(a) to weld pipe to be operated at any stress level allowed in the regulations may not weld that pipe, including pipe to be operated at less than 20% of SMYS, for more than six months following his qualification unless he has had at least one weld tested and found acceptable under Section 3 or 6 of API Standard 1104.

Question 4: Is it a correct interpretation that 192.125(c) is limiting to 100 psi only the ASTM B 88 type "L" copper referred to in 192.125(b), and that copper with a greater wall thickness is not restricted to 100 psi?

Answer: No, §192.125(c) prohibits the use of copper pipe of any thickness in operation above 100 psig.

Sincerely,

Cesar DeLeon
Acting Director
Office of Pipeline
Safety Operations

TENNESSEE PUBLIC SERVICE COMMISSION

January 2, 1976

Mr. Cesar DeLeon
DEPARTMENT OF TRANSPORTATION
Office of Pipeline Safety
2100 2nd Street, SW
Washington, D.C. 20590

Dear Mr. DeLeon:

1. Is it a correct interpretation that a welder qualified initially under 192.227(a) in accordance with the 1968 ASME Boiler and Pressure Vessel Code, Section IX is, in effect, required by 192.229(c) to re-qualify after 6 months in accordance with API 1104 only, not Section IX?
2. If the interpretation in Question 1 is correct, can a welder, after 6 months, initially qualify again in accordance with Section IX?
3. Is a welder qualified in accordance with 192.227(a) automatically qualified for a year in accordance with 192.227(c) for pipe operating at less than 20% SMYS?
4. Is it a correct interpretation that 192.125(c) is limiting to 100 psi only the ASTM B 88 type "L" copper referred to in 192.125(b), and that copper with a greater wall thickness is not restricted to 100 psi?

Sincerely,

John Searcy, Engineer
Engineering Division