

SPEED MEMO

SUBJ: Interpretation of Section 192.739

DATE: December 7, 1976

TO: Marshall W. Taylor, II
Chief, Central Region

INITIAL MESSAGE:

Did the interpretation of section 192.739 set forth in my memo of October 4 to you provide an adequate response to your memo of August 23?

REPLY MESSAGE:

The interpretation received is an adequate response to our request of August 23; however, it appears that the request should have been worded differently to apply to the actual situation. At the end of the first paragraph of our request, instead of stating "Since the relief device is not required by our regulations...", it should have stated "Since the relief device is not required by design considerations or our regulations to prevent overpressure of the system." In this case the operator has installed monitor regulators to prevent an overpressure situation from developing but has left the original relief devices in place.

As a result of our interpretation the operator will probably remove those relief valves from service and will still have adequate overpressure protection as required by Part 192.

FROM: Cesar DeLeon
Acting Director, Office of Pipeline
Safety Operations

DATE OF REPLY: December 14, 1976

MEMORANDUM

TO: Chief, Central Region, MTP-50-CE

FROM: Acting Director, Office of
Pipeline Safety Operations

DATE: October 4, 1976

SUBJECT: Interpretation of §192.739

Your memo of August 2, 1976, asks whether the maintenance requirements of §192.739 apply to pressure relief devices on a gas pipeline which are voluntarily installed by an operator at locations where relief devices are not required by §192.195.

To provide for safe operation of pipelines, the maintenance requirements of §§192.739 and 182.743 apply to all relief devices on a pipeline whether or not their installation is required by §192.195. This unrestricted application is indicated by §192.703 which provides:

"No person may operate a segment of pipeline, unless it is maintained in accordance with this subpart."

If §§192.739 and 192.743 were only intended to apply to relief devices which are required by §192.195, then the maintenance requirements would not apply to pipelines in existence when the requirements were adopted, a result contrary to the intent of Congress as set forth in Sec. 3 of the Natural Gas Pipeline Safety Act of 1968.

Cesar DeLeon