

May 23, 1977

Mr. T. W. Carlisle  
Senior Mechanical/Safety Engineer  
Santa Fe Pipelines System  
1200 Thompson Building  
5th and Boston Street  
Tulsa, OK 74103

Dear Mr. Carlisle:

This is in reply to your letter dated February 8, 1977, regarding pipeline maintenance procedures for liquid pipelines.

QUESTION: "When it becomes necessary to replace a short damaged section of pipe during pipeline maintenance using a butt weld joining technique, does DOT recognize visual inspection of the weld as a 'safe manner' procedure."

ANSWER: Whenever a segment of an existing pipeline is replaced, relocated, or otherwise changed, the new portion, in addition to being subject to the reporting, operating, and maintenance requirements, is also subject to the design, construction, and testing requirements of Part 195. Visual inspection of a weld is a safe manner procedure and is an acceptable inspection method. However, as specified in Section 195.228(a), ". . . Visual inspection must be supplemented by nondestructive testing." The criteria for nondestructive weld testing is specified in Section 195.234, Welds: Nondestructive testing and retention of testing records.

Thank you for your interest in pipeline safety.

Sincerely,

Cesar DeLeon  
Acting Director  
Office of Pipeline  
Safety Operations

February 8, 1977

Mr. Cesar DeLeon  
Acting Director  
Office of Pipeline Safety Operation  
Washington, D.C. 20590

Dear Mr. DeLeon:

This is a request for clarification in regards to pipeline maintenance procedure for liquid pipelines.

Paragraph 195.422 (a), Pipeline repairs states: "Each Carrier shall, in repairing its pipeline systems, insure that the repairs are made in a safe manner and are made so as to prevent damage to persons or property." At times it is necessary to weld in a new section of pipe. Other sections of Title 49 and Standard API 1104 recognize that butt welds can be adequately inspected in a "safe manner" by visual means rather than radiographic or other non-destructive tests.

The question in point is:

"When it becomes necessary to replace a short damaged section of pipe during pipeline maintenance using a butt weld joining technique, does DOT recognize visual inspection of the weld as a "safe manner" procedure."

We will appreciate your clarification of this question.

Very truly yours,

T. W. Carlisle  
Senior Mechanical/Safety Engineer