

PI-78-0104

July 31, 1978

Roberto N. Artola  
Gas Del Estado  
Normalizacion e Informacion Tecnica  
Alsina 1774  
1088 Buenos Aires  
Argentina

Dear Sir:

This is in reply to your letter of May 8, 1978, asking if gas pipelines to be operated above 20 percent SMYS that lie within a highway or railway right-of-way must meet the requirements of 49 CFR 192.243(d)(4) whether they cross or parallel the highway or railway.

Section 192.243(d)(4) sets forth the percentage of each day's field butt welds that must be nondestructively tested on pipelines to be operated at 20 percent of SMYS or more when such testing is required by Section 192.241(b). Paragraph (d)(4) states that: "Within railroad or public highway rights-of-way...100 percent." Under this requirement, the term "within" refers to pipelines inside the right-of-way, including those that either cross or parallel a railroad or highway. Thus the applicability of Section 192.243(d)(4) is not affected by the relative position of the highway or railroad to a pipeline within the right-of-way.

We trust that this adequately responds to your inquiry. If we can be of any further assistance, please let us know.

Sincerely,  
Cesar DeLeon  
Associate Director for  
Pipeline Safety Regulation  
Material Transportation Bureau

Ministerio de Economia  
Corporacion de Empresas Nacionales  
Gas del Estado

May 8, 1978

Department of Transportation  
400, 6th. St., S.W.  
Washington, (D.C.)  
20590  
Estados Unidos de America del Norte

Gentlemen,

I am the manager of the Normalization and Technical Information Department of the State owned utility Gas del Estado. Our duties include the analysis and studies of standards and specifications to be complied with within the scope of our Company.

I am requesting you for an interpretation of the Minimum Federal Standards.

Please, kindly inform us whether the specification in 192.243 - d - 4 must be applied to all the natural gas pipelines operating to hoop stresses of over 20 percent of the SMYS running within the right-of-way of highways or railway lines, in parallel or in crossings.

We thank you in advance for your kind cooperation.

Cordially yours,  
Roberto N Artola  
Jefe Departamento  
p.p. Gas del Estado