

Mr. Foch LaFitte
Superintendent of Welding
El Paso Natural Gas Company
P.O. Box 1492
El Paso, Texas 79978

Dear Mr. LaFitte:

Your letter of April 1979, indicates that El Paso Natural Gas Company qualifies welders under the multiple qualification test of Section 3.2 of API Standard 1104 in accordance with Section 192.227(a). You ask if the test required each 6 calendar months by Section 192.229(c) to continue welder qualification must include the layout, cut, and weld of a 12- by 12-inch or larger saddle weld as is required in the original qualification.

When a welder has been previously qualified, only one weld must be tested and found acceptable for each 6-month period under either Section 3 or 6 of API Standard 1104 in order to comply with Section 192.229(c). The type of weld to be used to maintain a welder's qualification is not specified. A 12- by 12-inch or larger saddle weld could be selected by the operator for such testing, although a butt weld or fillet weld could also be used.

I hope that this clarifies the intent of Section 192.229(c).

Sincerely,

/signed M.A. Judah/

Cesar DeLeon
Associate Director for
Pipeline Safety Regulation
Materials Transportation Bureau

Mr. Cesar DeLeon, Associate Director
for Pipeline Safety Regulation
U.S. Department of Transportation
2100-2nd Street S.W.
Washington, D. C. 20590

Dear Mr. DeLeon:

Regarding our telephone conversation this date, El Paso Natural Gas Company has three operating divisions and near each division main office we maintain a division welding shop. Approximately ninety percent of the division welding is done in and out of these shops, the remainder is done by a few welders stationed in the remote pipeline districts.

Our division welding superintendents first tried using the single welder qualification but it was a problem due to testing time plus assurance that all welders were in compliance at all times. Two years ago it was decided that by using the multiple qualification for all company welders it would be less trouble, less expensive and at the same time assure that all welders were in compliance with the code,

All company welders were qualified on the multiple 12' butt weld, and a 12' on 12' saddle weld to API-1104 Code. Since then, and before the expiration of six months, they x-ray a production butt weld 12' or larger, fill out a test sheet, and attach the x-ray log sheet for each welder. My question is -- since we never have 12' on 12' or larger saddle production welds, are we required to have each welder lay out, cut and weld a 12' on 12' or larger at the end of each six months in order to maintain qualification for the multiple test?

Your truly,

Foch LaFitte
Superintendent of Welding