

Jan. 29, 1982

Mr. Ray B. Killough, Manager
Design, Construction & Production
Piedmont Natural Gas Company
Post Office Box 33068
Charlotte, NC 28233

Dear Mr. Killough:

We are sorry for the delay in answering your letter in which you discussed your interpretation of section 192.725(2). Our agreement with your interpretation is enclosed.

If we can be of any further assistance, please call.

Sincerely,

Melvin A. Judah
Acting Associate Director
for Pipeline Safety Regulation
Materials Transportation Bureau

Enclosure

No. 82-1
Date; January 29,1982

DEPARTMENT OF TRANSPORTATION
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION
MATERIALS TRANSPORTATION BUREAU

PIPELINE
SAFETY REGULATORY INTERPRETATION

NOTE:A pipeline safety regulatory interpretation applies a particular rule to a particular set of facts and circumstances, and, as such, may be relied upon only by those persons to whom the interpretation is specifically addressed.

SECTION: 192.725(a)

SUBJECT: Test Requirements for Reinstating Service Lines

FACTS: Section 192.725(a) states, in part, that "each disconnected service line must be tested in the same manner as a new service line, before being reinstated."

Question: What is the meaning of "disconnect" as used in section 192.725(a)?

Interpretation: The ordinary meaning of "disconnect" is to detach or physically separate. This meaning is intended under section 192.725(a) as indicated by the notice of proposed rulemaking (Notice 70-5, 35 FR 5482) upon which the rule was based. This meaning is also consistent with the purpose of the tests. Pressure tests are required for new service lines under Subpart J to assure that potentially

hazardous leaks are discovered. Such leaks could arise during construction or repair activity required to reconnect a service line that has been physically separated. This physical separation does not necessarily occur at or near the gas main but may occur anywhere along the length of a service line. A disconnection of this type may be caused by outside forces, routine maintenance, or by compliance with the abandonment requirements of section 192.725(b).

Within the industry, the word "disconnect" is sometimes used to refer to temporary discontinuance of service by closing the gas service valve. The rules proposed under Notice 70-5 above and finally adopted as sections 192.725 and 192.727 indicate that this variation of the meaning of disconnect was not intended under either section. Therefore, a "disconnected" service line is a service line that has been physically separated from a main and does not include a service line that remains physically connected to the main, or has been taken out of service by closing a valve between the main and service line.

Melvin A. Judah
Acting Associate Director
for Pipeline Safety Regulation
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