

Mr. R. G. Kearns  
Manager of Environmental Affairs  
and Pipeline Safety  
Williams Pipe Line Company  
P.O. Box 3448  
Tulsa, OK 74101

Dear Mr. Kearns:

This is in response to your letter dated December 2, 1981, concerning the application of ?195.304(b) to two factual situations.

The enclosed pipeline safety regulatory interpretation explains ?195.304(b) and gives its application to the two factual situations presented in your letter.

We hope this meets your needs.

Sincerely,

/signed

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

Enclosure

No. 82-4  
Date: June 4, 1982

DEPARTMENT OF TRANSPORTATION  
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION  
MATERIALS TRANSPORTATION BUREAU

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PIPELINE SAFETY REGULATORY INTERPRETATION

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te: 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: 195.304(b)

SUBJECT: Testing Components

FACTS: The following facts are given in a letter dated December 2, 1981, from R. G. Keearns, Williams Pipe Line Company, to the Office of Pipeline Safety Regulation

Case I

An existing pipeline was cut to install a new pump. A new check valve was installed in the existing line together with new suction and discharge piping, tees, ells, valves, and interconnected pump. The pipe was pretested. The pump was tested by the manufacturer at the factory. All other items were manufactured to the same standard as a tested prototype. The tie-in welds were radiographed.

Question: Does this pump station installation qualify as the "only item being . . . added" under ?195.304(b) and, therefore, excepted from the hydrostatic test requirement of ?195.302(a)?

Case II

In a header, four flanged end valves were replaced with identical new valves which were manufactured to the same standard as a tested prototype. Because only valves were replaced, do they qualify as the "only item being replaced" under ?195.304(b) and are, therefore, excepted from the test requirement of ?195.302(a)?

Interpretation: Section 195.304(b) was adopted on November 2, 1970, as Amendment 195-2, Docket No. HM-6. The preamble to that amendment makes clear that ?195.304(b) applies only to single item replacements or additions. In Case I, more than a single item has been added, and in Case II more than a single item has been

replaced. Therefore, in both cases, ?195.304(b) does not apply and hydrostatic testing is required under ?195.302(a).

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

December 2, 1981

Mr. Melvin A. Judah  
Acting Associate Director  
for Pipeline Safety Regulation  
Materials Transportation Bureau  
U.S. Department of Transportation  
400 Seventh Street SW  
Washington, D. C. 20590

Dear Mr. Judah:

In making pipeline repairs, e.g., replacing a section of damaged pipe, we have interpreted the intent of hydrostatic testing requirements as permitting the use of pretested pipe, weldneck flanges for connection to existing pipes, and radiographic inspection of welds. This minimizes down time in displacing the pipeline with water, the subsequent testing and dewatering. Pipeline Safety personnel have indicated such repair methods comply with the regulations. In making such a repair, four weldneck flanges are used which does not comply exactly with Paragraph 195.304(b) of the regulations. Four components (weldneck flanges) are used rather than a component.

Since several components are used in the above illustration, we have a question in regard to how broad of an interpretation can be placed on Paragraph 195.304(b). I have attached two sketches which depict two situations which come under Paragraph 195.304(b).

The first sketch is of a pump connected to a line. The line is in almost continuous use which if shut down for a hydrostatic test of the connecting fittings, valves, and pump would create product movement problems. The weld tees, ells, flanges, and valves are all manufactured in accordance with a prototype as required by Paragraph 195.304(b)(2). The pump was hydrostatically tested at the factory by the manufacturer. By using pretested pipe and x-raying the welds, which are the remaining items to complete the fabrication, all segments of the installation then meet the intent of the regulations. Would it be necessary to hydrostatically test the complete installation? Such testing would seem to be superfluous since all materials utilized have been constructed, hydrostatically tested or nondestructively tested in accordance with requirements.

The second sketch depicts a header with four connecting lines, including valves. Assume all four valves are to be replaced. Would hydrostatic testing be required?

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Please consider the questions presented and advise at your convenience. If clarification might be needed, you may contact me at 918 588-3248. Thank you.

Very truly yours,

R. G. Kearns  
Manager of Environmental Affairs  
and Pipeline Safety

**ATTACHMENTS**