

*MEMORANDUM*

DATE: November 9, 1984

SUBJ: INFORMATION: Interpretation Request - Repair of girth welds using split sleeves

FROM: Richard L. Beam  
Associate Director for Pipeline Safety Regulation, DMT- 30

TO: Edward Ondak, Chief, Central Region, OOE, DMT-14  
Thru: Robert L. Paullin Associate Director for Operations & Enforcement, DMT-10

Responding to your request of October 23, 1984, the following clarification of the regulations is more appropriate than an interpretation, which we do not believe the conditions warrant.

Your first two paragraphs generally paraphrase the intent and meaning of §§192.245(c) and 192.715(c) to the extent you state them, except that §192.715(c) requires the repair of a defective weld with a sleeve rather than "allows" it if it "cannot be repaired in accordance with paragraph (a) or (b).

The problem you present arises because of inappropriate application of §192.715 which is for the permanent field repair of welds in the maintenance of an existing line. It is not a "construction" requirement. When the operator repairs the Dresser coupled pipeline by "removing a section of pipe and welding in a new section" all applicable sections of Subpart E must be complied with in "replacement" of that section by welding, including §192.245. Repair of the "crack in one of the tie-in welds" must be in accordance with §192.245, and it would not be permissible to install "a full encirclement welded split sleeve" for such a repair. After the operator elected to repair the pipe by replacement of a welded tie-in section, the fact that the original pipeline was Dresser coupled is irrelevant.

The repair method you hypothesized is not appropriate for a replacement section in a "welded line" for the same reasons that it was not for the Dresser coupled one.

Requirements of §192.715(a) and (b) appear to be clear and specific, and if they cannot be met in the permanent field repair of welds in the maintenance of an existing pipeline, then paragraph (c) "must be" met. Circumstances in which paragraph (c) would apply would include those where it is not feasible to take the transmission line out of service and the conditions of paragraph (b) cannot be met (e.g., defective weld is leaking).

When the operator decides to repair the pipeline by "replacement" of a section, it does not enjoy the prerogative of being "not interested in establishing and qualifying procedures for repair of cracks" in the tie-in welds it must perform.

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*MEMORANDUM*

DATE: October 25, 1984

SUBJ: INTERPRETATION REQUEST: Repair of girth welds  
using split sleeves

FROM: Chief, Central Region, DMT-14  
Thru: Associate Director, OOE, DMT-10

TO: Associate Director, OPSR, DMT-30

192.245(c) requires that repair of a girth weld containing a crack be made in accordance with qualified written weld repair procedures.

192.715(c) allows for the repair of a defective weld by installing a full encirclement welded split sleeve of appropriate design if the weld cannot be repaired in accordance with 192.715(a) or (b).

If an operator, in repairing a dresser coupled pipeline made that repair by removing a section of pipe and welding in a new section of pipe, determined that there was a crack in one of the tie-in welds, could he satisfy the requirements of the regulations by installing a full encirclement welded split sleeve? Keep in mind that this is a dresser coupled pipeline, or contains dresser couplings, and the joints could have been made by using dresser couplings in the first place.

Could this same type of repair be made if the pipeline were a welded line?

What circumstances could warrant the weld "not repairable" by the criteria of 192.715(a) or (b)?

For the above situations, assume the operator is not interested in establishing and qualifying procedures for repair of cracks and repair of previously repaired areas.