

PI-84-0104

August 31, 1984

Mr. Galen D. Denio
Gas Pipeline Safety Engineer.
Nevada Public Service Commission
505 East King Street
Carson City, Nevada 89710

Dear Mr. Denio:

This responds to your letter of August 22, 1984, concerning the application of 49 CFR Part 192, §192.739, Pressure limiting and regulating stations: Inspection and testing, and §192.743, Pressure limiting and regulating stations: Testing of relief devices, to metering and pressure regulating equipment used to deliver gas to a single commercial or industrial consumer.

I am enclosing a copy of Interpretation 81-1, dated March 17, 1981. This interpretation makes it clear that these maintenance requirements (§§192.739 and 192.743) do not apply to regulator installations on service lines.

Sincerely,
Richard L. Beam
Associate Director for
Pipeline safety Regulation
Materials Transportation Bureau

No. 81-1
Date: March 17, 1981

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: §§ 192.197(c) or (c)(1), 192.739, and 192.743

SUBJECT: Pressure regulating and relief installation in high pressure distribution systems.

FACTS: None

QUESTION #1: Are the pressure regulating and relief installations described in §192.197(c) subject to the requirements of §192.739?

ANSWER: The pressure regulating and relief installations described in §192.197 for high pressure distribution systems are those for a service line with meter and service regulator and series regulator, service regulator or other protective devices.

The requirements of §192.739 are for regulating stations such as a city gate measuring and pressure regulating station or a distribution regulator station installed in a gas distribution main regulating a multiple feed distribution system.

Since the pressure regulating and relief devices described in §192.197 are neither a city gate measuring and pressure regulating station nor a distribution regulating station regulating a multiple feed distribution system, they are not subject to the inspection and testing requirements of §192.739.

QUESTION #2: Are the relief devices described in §192.197(c) (1) and (3) subject to the requirements of §192.743?

ANSWER: For the same reasons given in the answer to question #1, the relief devices described in §192.197(c)(1) and (3) would not be subject to the testing requirements of 192.743.

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