

Mr. Jose Hugo Muraco
Jefe De Normalizacian Tecnica
Centro Comunicaciones Don Bosco
Buenos Aires, Argentina

Dear Mr. Muraco:

Please refer to my letter to you dated January 7, 1992. The answer to question number 2 regarding pipeline river crossings was incorrect. I said that a design factor of 0.50, or less, is required for steel pipe in Class 1 or 2 locations in inland navigable waters, such as rivers. This answer was based on an incorrect reading of §192.111(d)(2).

The design factor for steel pipe, including pipe in inland navigable waters, such as rivers, is governed by §192.111(a), except as provided in §192.111(b)-(d). Under §192.111(a), the design factor varies by Class location, as follows:

Class 1.....0.72
Class 2.....0.60
Class 3.....0.50
Class 4.....0.40

The provisions of §192.111(b)-(d) do not require any variation from the above factors for pipe in river crossings. Note, however, that §192.111(d)(2) requires that in Class 1 and 2 locations steel pipe, including pipe risers, on platforms located offshore, or in inland navigable waters must have a design factor of 0.50 or less.

I hope my earlier response did not cause you any inconvenience.

Sincerely,

/signed/

Cesar DeLeon
Director, Regulatory Programs
Office of Pipeline Safety