

March 25, 1992

Mr. Greg Mullen  
Callier Steel Pipe & Tube, Inc  
Saint Louis, MO 63177

Dear Mr. Muller

We have received by facsimile your letter March 17, 1992, in which you request that the Office of Pipeline Safety (OPS) verify that the proposed procedure in your letter would satisfy Department of Transportation regulations for certifying pipe API5LB/X42 to a higher test line pipe grade for a gas storage project.

Section 192.55(a)(1) states in part that new steel pipe is qualified for use under Part 192 of the gas pipeline safety regulations if it was manufactured in accordance with a listed specification. Relative to your request, the applicable listed specification is API Specification 5L, 1988 Edition. We understand that your request applies to new pipe that has been certified to Grade X42 of API 5L and that you have manufacturer's certificates verifying that it also meets the requirements of Grade X52.

The preferred means to recertify the pipe to Grade X52 is to request that the manufacturer appropriately recertify and remark the pipe. In that case, it would be unnecessary for OPS to furnish an opinion because the pipe would be manufactured in accordance with a listed specification as required in § 192.55(a)(1).

If you are unable to obtain recertification from the manufacturer, OPS would consider that the pipe is manufactured in accordance with a listed specification (API 5L) if Callier does the following:

1. Review the manufacturer's certified test reports to verify that the material quality and attributes, including the chemical composition, mechanical properties, and mill test pressure, are in compliance with the specification requirements for Grade X52.
2. Remove from each piece of pipe the manufacturer's name or mark, the grade marking, and the API monogram.
3. Add to the markings that remain Callier's name or mark and the appropriate grade marking.

4. Issue a certified test report verifying that the pipe meets the requirements of Grade X52.

5. Maintain records establishing the traceability of the pipe to Callier's and the manufacturer's certified test reports.

Your letter proposes to use a control number marked on the pipe to maintain traceability. control number is not a requirement for marking of pipe produced to API 5L. However, a control number is essential for comparing the pipe to the corresponding documentation and should be included in your marks on the pipe.

If you have any questions, please contact G. Joseph Wolf of this office at (202) 366-4560

Sincerely,

Cesar De Leon  
Director, Regulatory Programs  
Office of Pipeline Safety