

September 16, 1992

Mr. Michael Baly, III  
American Gas Association  
1515 Wilson Boulevard  
Arlington, VA 22209

Dear Mr. Baly:

This responds to requests by members of your staff regarding the status of Petition P-43. Petition P-43 proposes that § 192.513, Test Requirements for Plastic Pipelines, be amended to exempt new plastic pipe, 10 feet or less in length, from pressure testing requirements. To qualify for exemption, the pipe would have to be visually checked, leak tested at operating pressures, and contain no joints.

The fundamental issue for consideration in this petition is whether visual inspection of new plastic pipe, 10 feet or less in length, coupled with leak testing at the operating pressure, would sufficiently provide pipeline safety. The petition asserts that pipe flaws that could rupture in field pressure tests would be detected by visual inspection, and that safety is further assured by the manufacturer's quality assurance testing and the absence of connecting joints in the pipe.

The petition does not reference or provide test data or other information to substantiate that relaxation of the pressure test requirement, as proposed, would provide an acceptable level of public safety. So, for guidance on this issue, we examined the 1989 edition of the ASME B31.8 Code. It establishes the industry standard for minimum test requirements of plastic pipe used in gas pipelines. Section 842.5 requires "all plastic piping" (except tie-in sections) to be pressure tested after construction and before being placed in operation to prove its strength. The code makes no exceptions based on pipe length or any of the other conditions described in the petition.

Lacking information to verify the safety of the rule the petition proposes, and in view of the current industry standard for testing of plastic piping, we must deny the petition.

Sincerely,

/signed/

Cesar De Leon  
Director, Regulatory Programs  
Office of Pipeline Safety