

July 15, 1993

Mr. Darrell A. McKown  
Manager, Gas Pipeline Safety Transportation Division  
West Virginia Public Service Commission  
P. O. Box 812  
201 Brooks Street  
Charleston, WV 25323

Dear Mr. McKown:

Thank you for your letter of May 10, 1993, requesting an interpretation of the gas pipeline standards in 49 CFR part 192. You asked whether the logic of §192.457(b) applies to corrosion under §§192.479(b), 192.481, and 192.483.

Section 192.457(b) applies to certain buried or submerged pipelines installed before August 1, 1971. The standard requires operators to cathodically protect areas of continuing corrosion that unless controlled could become detrimental to public safety. Under this standard, protecting against corrosion is discretionary, depending on the circumstances relevant to public safety.

In contrast, §§192.479(b), 192.481, and 192.483 do not allow operators to exercise discretion in applying protection against corrosion. Operators must apply the prescribed protective measures to all corrosion covered by these standards.

Sincerely,

Cesar De Leon  
Director, Regulatory Programs  
Office of Pipeline Safety