

February 00, 1994

Ms. Mary L. McDaniel, P.E.
Manager, Pipeline Safety
Railroad Commission of Texas
PO Box 12967
Austin, TX 78711-2967

Dear Ms. McDaniel:

Your letter of October 4, 1993, requests our assistance in responding to two questions. According, we are providing the following information:

Question #1 What insight can RSPA provide on “small entities” as the term is used in the paragraph titled “Regulatory Flexibility Act” in the Notice of Proposed Rulemaking-Drug and Alcohol Testing Programs-published December 15, 1992, (57 FR 59714)?

Answer #1 The term “small entity” is defined in § 601 of the Regulatory Flexibility Act (5 U.S.C. 601-612). A review of the enclosed copy of the Act should provide the requested information.

Question #2 Section 192.719(a) - Testing of replacement pipe. When the replacement pipe is made up of several joints that were individually hydrostatically tested, then welded together and the girth welds 100 percent non-destructively tested; must the resulting segment be re-hydrostatically tested as a unit?

Answer #2 Under § 192.243(d) (4), girth welds at pipeline tie-ins must be 100 percent non-destructively tested. Under § 192.719(a), there is no requirement to hydrostatically test the replacement segment, as a unit, if the individual pipe joints have been properly hydrostatically tested before installation.

Please let me know if you need further information on either of the questions.

Sincerely,

Cesar De Leon
Director, Regulatory Programs
Office of Pipeline Safety

Additional Comments in the margins:

To: Huntoon, Ondak, Gute, Thomas, Joyner, Sanders

From: Cesar De Leon

I have a disagreement on Question #2. Please send me your comments. Soon.

I don't think the joints connecting the several pipe lengths are tie-in joints. So entire segment must be tested to test the connecting welded joints. (192.503(d)).

*Thanks,
Buck Furrow*