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Cc: DeLeon, Cesar; Tenley, George; Garnett, Albert; Betsock, Barbara; Collaku, Angelo
Subject: Passage of instrumented internal inspection devices (update no.2)
Date: Wednesday, May 11, 1994 5:29PM

The Passage of Instrumented Internal Inspection Devices was published April 12, 1994 and the effective date is May 12, 1994. Each of you was sent a copy.

The rule states that in each "line section" of a gas transmission line where the line pipe, valve, fitting or other line component is replaced, the "line section" must be designed and constructed to accommodate an instrumented internal inspection device. "Line section" is defined to mean a continuous run of transmission line between adjacent compressor stations, between a compressor station and storage facilities, between a compressor station and a block valve, or between adjacent valves. In other words, if an operator replaces a portion of the line, the entire "line section" must be made piggable.

There is a similar requirement for hazardous liquid pipelines.

The AGA and INGAA have petitioned for reconsideration of this "line section" requirement. We are considering their petition. Until you hear from us again, please do not enforce, on either gas or hazardous liquid pipelines, the requirement that the entire line section be made piggable if a line pipe, valve, fitting, or other line component is replaced. All of the other requirements regarding new pipeline construction in this final rule are applicable on May 12, 1994.

Nonetheless, while the enforcement of these regulations for replacement pipeline is deferred, you should encourage pipeline operators to voluntarily comply with the replacement rules as set out [sic] in the published rule.

I am faxing a printout of this e-mail message to INGAA, AGA, and API. I am also sending a copy of this e-mail to each state.