

Memorandum

Date: October 24, 1994

Subject: **INFORMATION**: O&M manual regulations

From: Cesar De Leon, DPS-10

To: Richard Sanders, DTI-60

This responds to your memo of April 11, 1994, concerning the gas pipeline regulations in 49 CFR § 192.605.

Regarding § 192.605(a), you asked if it is the intent of this rule that all references to design and construction be omitted from O&M manuals. Operators must include in their manuals as much design and construction information, such as welding or other joining procedures, as is necessary to carry out operation, maintenance, and emergency response activities. For example, if a pipeline is to be repaired by replacing a segment of pipe, the operator's O&M manual would have to have design and construction information appropriate for that type of repair. Also, the O&M manual must contain procedures that enable operating and maintenance personnel to obtain as much original design and construction information as they need to carry out their assignments. However, such original information may be maintained apart from the manual.

Regarding § 192.605(b)(5), you suggested we remove the phrase "plus the build-up allowed for operation of pressure limiting and control devices," because it allows operators to exceed the MAOP during start up and shut down of a pipeline. The purpose of this rule is [sic] that start up and shut down of a pipeline does not cause unsafe overpressuring. An unsafe overpressure occurs when pressure exceeds the build-up allowed for operation of pressure limiting and control devices. We think the pressure wording of § 192.605(b)(5) is clear in this regard and should not be changed.

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