

U.S. Department
of Transportation

400 Seventh Street, SW
Washington, DC 20590

**Research and
Special Programs
Administration**

September 8, 1995

Mr. Norm Block
Executive Vice President
Clock Spring Company
14107 Interdrive West
Houston TX 77032

Dear Mr. Block:

Thank you for your letter requesting clarification of the waiver published February 27, 1995, on the repair of high-stress gas transmission lines (60 FR 10630).

You asked if the waiver requires monitoring of all repair sites. Site monitoring is the subject of the third condition of the waiver. Under this condition, only a statistical sample of sites is to be excavated and evaluated at 2-year intervals, consistent with a Gas Research Institute plan. The number of sites needed for a statistically significant evaluation should be small compared with the total number of repair sites.

You also asked if pipe that is repaired by Clock Spring[®] wrap under the waiver must be replaced when it becomes feasible to do so. The waiver exempts operators from complying with 49 CFR 192.713(a), including the requirement to replace imperfect or damaged pipe if it is feasible to remove the line from service. Therefore, pipe that is repaired under the waiver need not later be replaced to comply with §192.713(a).

I trust you will find this information helpful. If you need further assistance, please let me know.

Sincerely,

Richard B. Felder
Associate Administrator
for Pipeline Safety