

U.S. Department  
of Transportation

400 Seventh Street, SW  
Washington, DC 20590

**Research and  
Special Programs  
Administration**

October 18, 1995

Ms. Angela S. Motley  
Public Utilities Engineer  
Massachusetts Department of Public Utilities  
Leverett Saltonstall Building  
100 Cambridge Street  
Boston, MA 02202

Dear Ms. Motley:

This is in response to your letter of August 2, 1995, requesting an opinion on 49 CFR 192.229(c) which states in part:

“A welder qualified under §192.227(a) may not weld unless within the preceding 6 calendar months the welder has had one weld tested and found acceptable under section 3 or 6 of API Standard 1104 . . .”

You cite a situation where welders' radiograph inspection sheets submitted to document compliance with §192.229(c) were of 16-inch welds completed by two welders. You ask: “Does this meet the code requirements since the weld was completed by more than one welder?”

The intent of the requirement in §192.229(c) is for at least one entire weld to be tested and found acceptable under section 3 or 6 of API Standard 1104 within the preceding six calendar month period in order for the welder to continue to be qualified under §192.227(a). We agree with the observation in your letter that the welder needs to demonstrate the ability to weld in all welding positions.

Sincerely,

Richard D. Huriaux, P.E.  
Director for Technology and Regulations  
Office of Pipeline Safety