

9-16-96

Mr. Glynn Blanton  
Chief, Gas Safety Division  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

Dear Mr. Blanton:

Thank you for your letter of August 20, 1996, regarding the welding regulation in §192.229(c)(1). You asked if this regulation prevents welders who qualify under the ASME Boiler and Pressure Vessel Code from requalifying under that code.

Section 192.229(c)(1) provides that welders qualified under §192.227(a) may not weld pipe to be operated at 20 percent or more of SMYS unless, within the preceding six calendar months, the welder has had one weld tested and found acceptable under section 3 or 6 of API Standard 1104. The purpose of this regulation is to maintain welder qualifications that were established as required by §192.227(a) under either section 3 of API Standard 1104 or section IX of the ASME Boiler and Pressure Vessel Code. Section 192.229(c)(1) does not preclude welders from requalifying under section IX of the ASME Boiler and Pressure Vessel Code instead of maintaining their qualifications by having a weld tested under section 3 or 6 of API Standard 1104.

I hope you find this information helpful. Please let me know if you have any further questions.

Sincerely,

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

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