

Feb. 9, 1999

Mr. Jack R. Crawford
Vice-President, Public and Government
Alliance Pipeline Ltd.
Suite 400, 605 - 5th Avenue S. W.
Calgary, AB
Canada T2P 3H5

Dear Mr. Crawford:

On November 19, 1998, Alliance Pipeline representatives and consultants provided the Office of Pipeline Safety a briefing on the mechanized welding and mechanized ultrasonic technologies it plans to use for inspection of girth welds during construction of the proposed pipeline. Alliance also plans to rely on the Appendix to American Petroleum Institute (API) Standard 1104, *Alternate Acceptance Standards for Girth Welds*, which is based on fracture mechanics principles, to judge the acceptability of girth welds covered by the appendix instead of the workmanship standards of Section 6.0 of API Standard 1104. Alliance requested a clarification on the use of only the appendix for acceptance of girth welds covered by the appendix.

Section 192.241 of the Federal gas pipeline safety regulations (49 CFR Part 192) permits operators to use the Appendix to API Standard 1104 to judge the acceptability of applicable welds that do not contain cracks but otherwise do not pass Section 6.0 criteria. Since the Appendix may be used on welds that are defective under Section 6.0 - a worst-case scenario - there is no reason to interpret Section 192.241 to disallow use of the Appendix on welds that are not defective under Section 6.0. Therefore, the Appendix may be used for all welds covered by the Appendix that do not contain cracks without first evaluating them by Section 6.0.

If we can be of further assistance, please contact me or Lloyd Ulrich at (202) 366-4556

Sincerely,

Richard D. Hurliaux, P.E.
Manager, Regulations
Office of Pipeline Safety