

Mr. Daniel L. Drake  
Manager, Gas Engineering  
Baltimore Gas & Electric Company  
Gas & Electric Building  
Baltimore, Maryland 21203

Dear Mr. Drake:

This is in reply to your letter of December 3, 1970, concerning the requirements for non-destructive testing of welds on pipelines in public highway rights-of-way contained in 49 CFR, Section 192.243(d)(4).

Your suggestion of lowering the requirement was submitted to this Office during the rulemaking process in the development of Part 192. It was carefully considered by this Office and, on the basis of information then available, not accepted in the rule as issued.

The rule is still considered to be a sound one in the interest of safety. However, if you have additional information not available to us prior to August 11, 1970, you may wish formally to ask us to initiate a new rulemaking procedure.

Thank you for your interest in the pipeline safety program.

Sincerely,

/signed/

Joseph C. Caldwell  
Director, Acting  
Office of Pipeline Safety