

Mr. James S. Stites
Chief, Gas Department Utilities Division
South Carolina Public Service Commission
P. O. Drawer 11649
Columbia, SC 29211

Dear Mr. Stites:

I am responding to your letter of March 22, 1993, asking whether radiographs of welds must be retained for the life of the facility. You also asked how long radiographs must be retained if not for the life of the facility.

The standards in 49 CFR parts 192, 193, and 195 do not specify a retention time for weld radiographs. And we do not interpret the record-keeping requirements of §§192.243(f), 193.2329, and 195.266(a) regarding weld tests to require retention of radiographs. So an operator need not retain a weld radiograph beyond the time necessary to interpret the radiograph and accept or reject the weld.

Sincerely,

Cesar De Leon
Director, Regulatory Programs
Office of Pipeline Safety