

Mr. William R. Johnson, Secretary  
California Public Utilities Commission  
California State Building  
San Francisco, CA 94102

Dear Mr. Johnson:

Thank you for your letter of April 9, 1974, commenting on an oral interpretation by Office of Pipeline Safety staff concerning 49 CFR 192.557(b)(5) as it pertains to steel pipelines operated at a hoop stress of less than 30 percent of SMYS. As you state, this section requires that before a segment of pipeline is uprated it must be isolated from any adjacent segment that will continue to be operated at a lower pressure. According to your letter, our interpretation was that section 192.557(b)(5) also requires testing for leaks for a period of at least 1 hour, and it is your understanding that the test may be accomplished by leak survey.

Subject to the requirements of section 192.621 or section 192.623, as the case may be, the maximum allowable operating pressure for a pipeline may not be increased above the lowest pressure determined under section 192.619(a). For a steel pipeline operated at 100 psig or more, in uprating under section 192.557 to a pressure permitted by section 192.619(a)(2)(ii), a pressure test must be performed under that section. Steel pipelines operated at less than 100 psig may be uprated under section 192.557 to a pressure permitted by section 192.619(a) without conducting a pressure test. Where a pressure test is performed in uprating under section 192.557, the standards do not specify the nature of the test. However, the provisions of section 192.507, applicable to tests on new or replaced or relocated pipe, can serve as a guide. Under this section, a test pressure must be held for 1 hour. In spite of this interpretation, the Commission may wish to consider waiving the pressure test requirement in appropriate circumstances as permitted by section 3(e) of the Natural Gas Pipeline Safety Act of 1968.

In conjunction with uprating, section 192.553(a)(1) requires incremental pressure increases to be held while the pipeline is checked for leaks. This leak check may be performed by survey, and there is no minimum time specified for holding the pressure.

We trust this interpretation corrects any misunderstanding you may have. We are always happy to answer any requests for interpretations. We prefer, however, that requests be made in writing to avoid possible misunderstanding by both parties involved.

Sincerely,

Signed: De Leon

Joseph C. Caldwell  
Director  
Office of Pipeline Safety

April 9, 1974

Office of Pipeline Safety  
Department of Transportation  
400 Seventh Street, SW  
Washington, D.C. 20590

Gentlemen:

The commission is concerned with a ruling received from your people on the interpretation of Section 192.557(b)(5) of our General Order No. 112-C. Telephonically your staff has indicated this requires that the section of pipeline to be uprated has to be completely isolated and tested for leaks for a period of at least one hour. This interpretation is not in accord with the strict wording of this section. The requirement for isolation from ... "any adjacent segment that will be continued to be operated at a lower pressure" is simply a necessary requirement to raising the pressure in the line to be uprated and is not part of the uprating test procedure.

Certain lines falling into the classification of producing a hoop stress less than 30% of SMYS are feeder mains that cannot be taken out of service for such testing without shutting down a large number of customers. Since these lines are operating at less than 30% of SMYS the interpretation that has been provided is unduly restrictive and may place an unnecessary hardship on the customers of the gas system.

Our staff has interpreted Section 192.557, with respect to the testing procedure for transmission lines, that such uprating should be done at a time of minimum pressure gradient and that the leak test may be done by leak survey.

The Commission believes that no modification to the requirements is necessary; however, the interpretation being made of these requirements should be corrected to reflect good operating practice.

Very truly yours,

**PUBLIC UTILITIES COMMISSION**

William R. Johnson, Secretary