

August 29, 1984

Mr. R. L. Dean
Tennessee Gas Pipeline
Division of Tenneco Inc.
Tenneco Building
P.O. Box 2511
Houston, Texas 77001

Dear Mr. Dean:

This responds to your request for a waiver of §192.553(d) to uprate nine Class 2 sections of Line 200-1 from 731 psig to 760 psig.

Each section had a 760 psig MAOP under §192.619(a)(3) until the Class 2 location changes occurred, whereupon the MAOP of each section was reduced to 731 psig in accordance with §192.611(b). Since then, each Class 2 section either has been or soon will be tested to at least 90 percent of SMYS (1096 psig).

We believe a waiver of §192.553(d) is not needed for you to operate the nine sections at 760 psig. Section 192.553(d) applies to a "new" MAOP being established under Subpart K. In the case of the nine sections, the 760 psig value would not be a new MAOP but an old one that can be resumed by application of §192.611(c).

With a 90 percent SMYS test, §192.611(c)(1) would permit operation at .8 times the test pressure, or 877 psig. Although this after-test MAOP would be limited by §192.611(c)(2) to the MAOP "established before the confirmation or revision", the limiting value should be considered 760 psig, not 731 psig. The MAOP "established before the confirmation or revision" means the MAOP in effect when the class change occurred that triggered confirmation or revision under §192.611, which in this case was 760 psig. The 731 psig value is one that was established as a result of confirmation or revision.

Further, there is nothing in §192.611(b), (c), or (e) that bars application of paragraph (c) once paragraph (b) has been applied. Under §192.611, paragraphs (b) and (c) provide independent alternative ways to comply with the confirmation or revision rule. Choosing pressure reduction under paragraph (b) initially is not inconsistent in any way with testing later under paragraph (c) to confirm the preexisting MAOP. Paragraph (e) requires that

confirmation or revision be done within 18 months after a class change occurs. It does not preclude taking alternative compliance action at a later date.

Sincerely,

Richard L. Beam
Associate Director for
Pipeline Safety Regulation
Materials Transportation Bureau