

October 22, 1992

Mr. Dan Weaklend
Chief, Pipeline Safety
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona, 85007

Dear Mr. Weaklend:

This responds to your June 12, 1992, letter in which you enclose a drawing of two distribution systems with regulator stations. Since the only difference in the two distribution systems you portray is the size of the operator, the two systems are subject to the same inspection and test requirements.

You request that we identify inspections and tests the operator would be required by §192.739 to conduct. Specifically, you asked if set-point, lock-up, and full-stroke operation are part of the required inspections and tests.

Set-point, lock-up, and full-stroke are undefined in Part 192 and are not specified as necessary for compliance with § 192.739. Section 192.739 requires all pressure limiting and regulating stations to be subjected, at intervals not exceeding 15 months, but at least one each calendar year, to inspections and tests to determine if the station has the qualities listed in paragraphs (a)-(d) of § 192.639.

Regulator stations must be inspected and tested to comply with § 192.739 using any practicable method that will demonstrate the presence or absence of the listed qualities. Set-point, lock-up, and full-stroke-operation would be part of the inspection and testing if such tests are practicable at the station concerned. If not, whatever other tests are practicable in meeting the requirements of § 192.739 must be saved. Specific procedures should be documented in the utility's operating and maintenance plan prescribed by § 192.605.

If you have further questions, please contact Mr. Jim Thomas, Regional Director, Southwest Region (713-750 1746).

Sincerely,

Cesar De Leon
Director, Regulatory Programs
Office of Pipeline Safety