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Chief, Central Region, MTP-50-CE

Acting Director, Office of  
Pipeline Safety Operations

Interpretation of §192.739

Your memo of August 2, 1976, asks whether the maintenance requirements of §192.739 apply to pressure relief device on a gas pipeline which are voluntarily installed by an operator at locations where relief devices are not required by §192.195.

To provide for safety operation of pipelines, the maintenance requirements of §§192.739 and 192.743 apply to all relief devices on a pipeline whether or not their installation is required by §192.195. This unrestricted application is indicated by §192.703 which provides:

"No person may operate a segment of pipeline, unless it is maintained in accordance with this subpart."

If §§192.739 and 192.743 were only intended to apply to relief devices which are required by §192.195, then the maintenance requirements would not apply to pipelines in existence when the requirements were adopted, a result contrary to the intent of Congress as set forth in Sec. 3 of the Natural Gas Pipeline Safety Act of 1968.

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