

January 24, 1972

Mr. Edward B. Smith
President
The Pipe Line Development Co.
1831 Columbus Road
Cleveland, Ohio 44113

Dear Mr. Smith:

This is a further acknowledgment of your letter of November 3, 1971, regarding non-destructive welding standards in the natural gas pipeline safety regulations. Our response to your specific questions is as follows:

1. Do the new standards actually say that fillet welds on tie-ins must be 100% non-destructively tested?

The intent of our regulation, Paragraph 195.234(e)(4), was to require 100% non-destructive testing of girth butt welds that were tie-in welds. The principal reason for requiring 100% non-destructive testing of these welds was the fact that such tie-in welds are comparatively more difficult to make and require special consideration in attaining proper alignment and performing a quality weld. Security fillet weld similar to those used on your weld + ends coupling are not considered as tie-in welds subject to the requirements of Paragraph 195.234(e)(4).

2. Is Plidcotesting a satisfactory non-destructive test?

The regulations do not forbid a test such as Plidcotesting. However, Plidcotesting is not a non-destructive test as the term is used in Part 195. Non-destructive test, as required in 195.234, is one which evaluates the weld without impairing the weld's usefulness.

Thank you for your interest in the pipeline safety program. If you have any additional questions, please advise.

Sincerely,

Joseph C. Caldwell
Acting Director
Office of Pipeline Safety