

Apr 13 1972

Mr. A. G. Barkow
Natural Gas Pipeline Company
of America
122 South Michigan Ave.
Chicago, Illinois 60603

Dear Mr. Barkow:

This is in answer to your letter of March 14, 1972, regarding paper back film for radiography, and the film's acceptability under the Department's pipeline safety regulations.

There are two sets of Federal pipeline safety regulations which include requirements for the nondestructive testing of field girth welds. One is the gas pipeline safety regulations contained in Part 192 of the Code of Federal Regulations (49 CFR Part 192) which is titled "Transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards." The other is the set of regulations over liquid pipeline carriers engaged in the transportation of liquid hazardous materials and petroleum in interstate and foreign commerce. These regulations are located in Part 195 of the Code of Federal Regulations (49 CFR Part 195) and are titled "Transportation of Liquids by Pipeline."

The gas safety regulations in Paragraph 192.243(a) require that "Nondestructive testing of welds must be performed by any process, other than trepanning, that will clearly indicate defects that may affect the integrity of the weld." This is a performance standard in that no particular process is specified.

The liquid safety regulations are also performance oriented concerning the nondestructive testing of welds. Paragraph 195.234(a) requires that "A weld may be nondestructively tested by any process that will clearly indicate any defects that may affect the integrity of the weld." The liquid safety regulations also require in Paragraph 195.234(g) that film, when radiography is used, "must be retained for three years after the line is placed in operation."

The safety goal in welding is to produce a weld that will be free of defects which might impair the structural integrity of the weld. Any nondestructive testing process which will assure that this goal is accomplished by complying with the regulations cited above will be acceptable to the Department.

Please contact me if I can be of any further assistance in this matter.

Sincerely,

Joseph C. Caldwell
Director
Office of Pipeline Safety

Enclosures