

Chief, Southwest Region

Acting Director, Office of
Pipeline Safety Operations

Interpretations of Section 195.304,
Testing of Components, and 195.308,
Testing of Tie-ins

This refers to your office memorandum request for an interpretation of Section 195.308 as it relates to Section 195.304. You ask whether Section 195.308 requires that pipe at tie-ins be hydrostatically tested if a carrier has a manufacturer's certification for the pipe in accordance with Section 195.304.

As a general requirement under Section 195.302, each pipeline system or part thereof which is installed, relocated, or replaced must be hydrostatically tested by the carrier. The purpose of Section 195.308 is to provide that in hydrostatically testing pipe associated with tie-ins in a pipeline system, the test may be made either with the section to be tied in or separately.

The exception from the general requirement under Section 195.304, where the manufacturer of a component makes a certification regarding hydrostatic testing at the factory, does not apply to pipe.

While Section 195.2 includes the term "pipe" within the definition of the term "component," the two terms are used distinctly in Section 195.304 to provide that only components other than pipe need not be hydrostatically tested.

Under this interpretation, a hydrostatic test performed on pipe at the factory would not meet the requirements of Section 195.302 and 195.308 that pipe at tie-ins be hydrostatically tested by the carrier for at least 24 hours either with the section to be tied in or separately.

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