

January 12, 1976

Chief, Western Region

Chief, Technical Division

Interpretations - Sections 195.416(f), 195.412, 195.404(c)(2), and 195.418(d)

Speed memo 75-WESM-31 dated October 31, 1975, which was directed to the Chief, Operations Division has been forwarded to this division for action. The various questions which have been presented have been thoroughly reviewed with each discussed in detail herein.

Section 195.416(f) states that a generally corroded pipe may be repaired rather than replaced if the area is small. What is a "small area" or, stated more specifically, what conditions would dictate the replacement of a section of pipe rather than the use of a half or whole sole?

Interpretation: There is no clear cut answer to the question which has been presented. It appears that the best approach to the question is to discuss the various aspects which are involved.

Webster's New Collegiate Dictionary defines small in various ways, but little in an objectively measurable aspect is applicable for this situation. An operator or evaluator must use judgement and past experience in conjunction with all the facts which are pertinent to the local situation when deciding whether the area is small. When a decision of this nature is made, the integrity of the pipe is of primary importance.

When external corrosion is found, the actual pipeline situation must include a thorough evaluation of all parameters including the characteristics of the corrosion and the remaining pipe strength must be estimated.

Battelle Columbus Laboratories have conducted a considerable amount of study, experimental and analytical, in an effort to determine the integrity of corroded pipe. They concluded that the remaining strength of corroded line pipe can be predicted with confidence if the extent in the longitudinal direction, depth of corrosion, and the area of corrosion are known. The method developed by Battelle is an acceptable method for determining the integrity of corroded pipe. A copy of the Battelle report is attached.

Local conditions and particularly local economics will dictate whether a section of pipe is replaced or repairs in place are made using either half or whole sole. There is no rule which applies to all conditions.

Section 195.412 requires a right-of-way inspection at intervals not exceeding 2 weeks and Section 195.404(c)(2) requires a record of that inspection. Does an invoice from an aerial patrol service meet these requirements?

Interpretation: An invoice from an aerial patrol service might or might not meet the requirements of the regulations--whether or not an invoice meets the requirements of the regulations depends solely upon what might or might not be written on the face or the invoice or an attachment to the invoice.

An invoice which indicates a charge for services rendered does not meet the requirements of the regulations; whereas, an invoice which indicates a charge for aerial patrol services with pipeline identification and time or date of said aerial patrol services meets the requirements of the regulations.

Regulations written in performance language are sometimes difficult to enforce as they are not definitive as to what is required to meet or satisfy the requirements of the regulations. From a practical point of view, an evaluator must exercise judgement--is the invoice such that if he, the evaluator, were the carrier's authorized representative it would meet your requirements for approval for a payment--remember a good manager has subordinates who are responsible for the details, he will not always be in a situation where he personally knows.

Does a dated coupon with a label indicating location meet the requirements for the maintenance of a record of the inspection of the internal surface of a pipeline for rust as discussed in Section 195.418(d)?

Interpretation: No, a dated coupon with a label indicating location will not meet the requirements of Section 195.418(d). As a matter of fact, Section 195.418(d) is very definite in that it states "Whenever any pipe is removed from the pipeline for any reason, the carrier must inspect the internal surface for evidence of corrosion." The installation and monitoring of coupons is defined in Sections 195.418(b) and (c). Section 195.404(c) requires that a record of any inspection or repairs performed in accordance with Section 195.418(d) must be maintained such that the requirements of Section 195.404 are satisfied.

Frank E. Fulton, MTP-10

SPEED MEMO

DATE: 10/31/75

FROM: Office of Pipeline Safety Operations
Chief, Operations Division
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Washington, D.C. 20590

INITIAL MESSAGE

A formal interpretation of the following questions/situations is hereby solicited by the Western Regional Office on behalf of the several operators/carriers to whom these conditions apply; and, whose compliance or non compliance with pertinent sections of regulations is dependent on said interpretation.

1. 195.416(f) states that a generally corroded pipe may be repaired rather than replaced if the area is small. What is a "small area" or, states more specifically, what conditions would dictate the replacement of a section of pipe rather than the use of a half or whole sole?

2. 195.412 requires a R.O.W. inspection at intervals not exceeding 2 weeks and 195.404(c)(2) requires a record of that inspection. Does an invoice from an aerial patrol service meet these requirements?

3. Does a dated coupon with a label indicating location meet the requirements for the maintenance of a record of the inspection of the internal surface of a pipeline for rust as discussed in 195.418(d)?

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