

April 5, 1993

Ms. Marjorie H. Brant  
Counsel  
Columbia Gas Distribution Companies  
P.O. Box 117  
Columbus, Ohio 43216-0117

Dear Ms. Brant:

Your four letters of February 4, 1993, request opinions concerning gas pipeline safety regulations at 49 CFR §§192.181(b), 192.625(a) and 192.723(b). My letter of February 11, 1993, responded to your questions regarding 49 CFR §§192.625(a) and 192.723(b).

You asked if an operator could elect to classify a pipeline which is supplied from a transmission line but which operates at less than 20 percent of specified minimum yield strength (SMYS) as a transmission lateral. By definition, §192.3 states that a transmission line means a pipeline, other than a gathering line, that: transports gas from a gathering line or storage facility to a distribution center or storage facility, operates at a hoop stress of 20 percent or more of SMYS, or transports gas within a storage field. Since your pipeline operates at less than 20 percent of SMYS, if one of the other two conditions exists, you could classify your pipeline as a transmission line.

You asked if an accepted method exists for distinguishing a transmission main from a transmission lateral. Neither transmission main nor transmission lateral are terms used in Part 192; however, transmission line is defined as stated above. A main is defined as a distribution line (not a transmission line) that supplies more than one service line. Transmission line and distribution line are mutually exclusive terms.

You also asked if a regulator station, installed prior to 1970, would continue to be "grandfathered" if a pressure recording gauge is installed or if overpressure protection, such as a relief valve or monitor regulator, is installed. From your questions, I believe you are concerned whether the grandfather status of an entire regulator station would be altered if the changes you cite are made. As provided by §192.13(b), the grandfathered equipment that is not replaced, relocated, or otherwise changed would retain its grandfather status. The new equipment you install would be required to conform to the safety

regulations to the extent required by §192.13(a). Neither change you mention would trigger §192.181(b) because they do not alter the station as a whole.

We trust that this responds satisfactorily to your requests.

Sincerely,

Cesar De Leon  
Director, Regulatory Programs