

Mr. J. Lee Ballard
Sr. Vice President
Conam Inspection, Inc.
1385 Witherspoon Street
Rahway, New Hersey 07067

Dear Mr. Ballard:

his is in reply to your letter of February 17, 1971, concerning the interpretation of 49 CFR, Section 195.234(g), relating to liquid pipelines, and asking whether this section requires that each completed weld radiographed must be located exactly by stake number and that the radiograph number and weld number be listed on a form showing this location, or whether just the number of welds made and the number of radiographies exposed must be shown by location, as is required by 49 CFR, Section 192.243(f), relating to gas pipelines.

It is our interpretation that Section 195.234(g) requires that each radiograph be located as exactly as is practicable in the particular circumstances.

We are aware that this record-keeping requirement for liquid lines is more restrictive than that for gas pipelines contained in 49 CFR, Section 192.243(f). It is our intent to evaluate these differences in the near future to determine the advisability of making the two rules more consistent.

We appreciate your interest in pipeline safety.

Sincerely,

/signed/

Joseph C. Caldwell
Acting Director
Office of Pipeline Safety