

Mr. D. Glynn Rea, Jr.
Dow Chemical U.S.A.
Louisiana Division
Plaquemine, LA 70764

This responds to your letter of November 6, 1974, asking whether or not 49 CFR 192.243(f) or 195.234(g) requires that the location of welds be recorded by station number or geographic feature. You further ask if recording the location of welds is required, why this is necessary when a weld is X-rated and found acceptable.

Section 192.243(f) provides:

"(f) When nondestructive testing is required under §192.241(b), each operator must retain, for the life of the pipeline, a record showing by milepost, engineering station, or by geographic feature, the number of girth welds made, the number nondestructively tested, the number rejected, and the disposition of the rejects."

This section does not require that the precise location of welds be recorded. Rather, it requires the recording by milepost; engineering station, or geographic feature of certain information with respect to welds on the pipeline. Your practice of measuring lengths of pipe to locate each weld is not necessary to comply with §192.243(f).

Section 195.234(g) provides:

"(g) A record of the nondestructive testing must be retained by the carrier who is involved, including (if radiography is used) the developed film with, so far as practicable, the location of the weld. This record must be retained for 3 years after the line is placed in operation.

This section requires, where it is practicable to do so, recordation of the location of welds with the developed radiographic film. Any method of recording the location of welds may be used. Recording location by station number or geographic feature is one means of complying with the requirement. Recording the location of welds is of value for purposes of investigating accidents or compliance with the requirement for testing welds. The burden of complying with §195.234(g) is limited to the tests to which it applies. Any tests which your company voluntarily makes in addition to those to which §195.234(g) applies need not be recorded.

We realize the recordation requirement of §195.234(g) is more restrictive than §192.243(f). Consequently, we are considering the issuance of a notice of proposed rule making to amend §195.234(g).

Sincerely,
/signed\

Joseph C. Caldwell
Director
Office of Pipeline Safety

Mr. J. C. Caldwell, Director
Office of Pipeline Safety
Department of Transportation
400 Sixth Street SW
Washington, D.C. 20590

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1. Section 192.243, Paragraph F, subpart E Part 192, Title 49 of the Code of Federal Regulations, "Transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards"
 2. Section 195.234, Paragraph G, Subpart D of Part 195, Title 49, "Transportation of Liquids by Pipeline"

Dear Mr. Caldwell:

We would appreciate the Office of Pipeline Safety's interpretation of the captioned paragraphs.

Our standard practice is to 100% X-ray each weld in our pipeline system. All welds which are found to be unacceptable are removed or repaired and X-rayed again until all welds have been accepted. Removal, repair, radiographic inspection, and final acceptance of each weld is, of course, in accordance with the requirements and provisions of Parts 192 and 195 of the DOT Federal Standards and of API Standard 1104. In other words, each weld in our pipeline has been 100% X-rayed and accepted in accordance with the applicable DOT and API standards prior to operation of the line.

Our interpretation of the DOT requirements has been that it is necessary to locate, by engineering station numbers or geographic feature, each weld in the pipeline. In our attempts to conform with this requirement, however, we have found that the practice of employing personnel to measure lengths of pipe joints and to locate each weld by station number is expensive and impractical, and, in light of our standard procedure of 100% X-raying each weld, unnecessary. If each weld has been 100% X-rayed and accepted, why is it necessary to locate each one?

It is, of course, possible that we are misinterpreting the paragraphs in question. For this reason, I would greatly appreciate your interpretation and comments regarding this subject.

Sincerely,

D. Glynn Rea, Jr.