

February 21, 1978

Mr. D. W. Coughlin
National Fuel Gas
Distribution Corporation
10 LaFayette Square
Buffalo, New York 14203

Dear Mr. Coughlin:

In response to your recent letter, Section 8 of the 1973 edition of API 1104 is not required to be followed under §192.243.

An operator may follow any procedures for nondestructive testing that are designed to ensure that the testing process meets the performance requirements of that section.

Sincerely,

Cesar DeLeon
Acting Director
Office of Pipeline
Safety Operations