

July 7, 1975

Mr. John Searcy
Engineering Division
Tennessee Public Service Commission
Cordell Hull Building
Nashville, Tennessee 37219

Dear Mr. Searcy:

This refers to your letter of June 26, 1975, enclosing (1) a copy of a letter to this Office from Earl Kirkpatrick of Control Incorporated concerning the use of its "Bare Line Leakage and Corrosion Control Program" in lieu of an electrical survey to determine areas of active corrosion; and (2) a copy of your June 15, 1975, letter to R. E. Wood of Control, discussing, among other things, compliance with 49 CFR 192.457(b).

Section 192.457(b) requires in part:

The operator shall determine the areas of active corrosion by electrical survey, or where electrical survey is impractical, by the study of corrosion and leak history records, by leak detection survey, or by other means.

In your June 15 letter, you state that "A procedure which would determine areas of corrosion by leak detection survey would be in compliance with Section 192.457(b)." We are concerned that this statement is misleading. A more precise interpretation of the requirement is that a procedure which determines areas of active corrosion by leak detection survey would comply with Section 192.457(b) only where determination by electrical survey is impractical. We believe this distinction is significant not only from a legal and safety standpoint, but from a compliance standpoint in view of Control's apparent efforts to market its program as an alternative to the electrical survey method.

We intend to so advise Mr. Kirkpatrick when we formally receive his letter. Meanwhile, we suggest that to clarify the situation you amend your advice given to Mr. Wood in accordance with our interpretation.

Sincerely,

Joseph C. Caldwell
Director
Office of Pipeline Safety