

January 7, 1976

Mr. Joseph P. Kadlec, P.E.
Kadlec Associates
P.O. Box 100
Bartlesville, OK 74003

Dear Mr. Kadlec:

This responds to your letters of June 3 and October 17, 1975, asking which methods of "electrical survey" may be used to comply with the requirements of 49 CFR 192.457(b) and 192.465(e). These safety standards require that certain buried or submerged pipelines be cathodically protected in areas of active corrosion and that the operator determine the areas of active corrosion by electrical survey. Section 192.457(c) defines "active corrosion" as "continuing corrosion which, unless controlled, could result in a condition that is detrimental to public safety."

Under these requirements, an operator must use an electrical survey method which identifies all areas of continuing corrosion along a pipeline with enough detail so that the operator can determine whether a condition detrimental to public safety could result. This public safety determination is necessarily based, among other relevant factors, on the effect of any continuing corrosion on a pipeline. Therefore, to meet the requirements, an electrical survey method must provide accurate measurements, by direct or indirect techniques, of corrosion rate, loss of metal relative to pipe wall thickness, potential differences, and current flow, which are factors necessary to evaluate the effect of corrosion. There are many electrical survey methods that an operator can use to meet the requirements but this Office does not preferentially recommend one method over another.

As you requested, we have added your name to our mailing list to receive copies of the Advisory Bulletin and copies of gas pipeline safety rule making documents.

We appreciate your interest in pipeline safety.

Sincerely,

Cesar DeLeon
Acting Director
Office of Pipeline
Safety Operations