

January 30, 1976

Mr. John Searcy
Engineering Division
Tennessee Public Service Commission
Cordell Hull Building
Nashville, TN 37319

Dear Mr. Searcy:

This responds to your letter of July 14, 1975, in which you state: "With the 1976 deadline approaching we need to know whether to redirect our utilities or amend Part 192 in Tennessee to state specifically that leak surveys and/or records can be used as a method of determining areas of active corrosion, if such an amendment would not weaken the regulation."

The safety standards of 49 CFR 192.457(b) and 192.465(e) require that certain buried or submerged pipelines must be cathodically protected in areas in which active corrosion is found. Section 192.457(c) defines "active corrosion" as "continuing corrosion which, unless controlled, could result in a condition that is detrimental to public safety."

Section 192.457(b) and 192.465(e) require 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."

Under these requirements, an operator must use an electrical survey which identifies all areas of continuing corrosion along a pipeline with enough detail so that an 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. Only where determination by electrical survey is impractical is the operator permitted to meet compliance with other procedures. The phrase "where electrical survey is

impractical" as used in the subpart is to acknowledge those instances or situations where an operator, through no fault or shortcoming of his own, is incapable of performing an electrical survey due to extreme hardship, trouble, or expense.

Sincerely,

Cesar DeLeon
Acting Director
Office of Pipeline
Safety Operations