

MEMORANDUM

Date: November 15, 1978

SUBJECT: Interpretation of §192.457(b) & (c)

FROM : Associate Director for Pipeline Safety Regulation

TO : Associate Director for Operations and Enforcement

This refers to your memorandum of July 12, 1978, regarding CPF 2315 in which you ask the following questions:

May an operator reasonable conclude that corrosion in a specific area will not cause a condition detrimental to public safety, and that it is, therefore, unnecessary for him to meet the electrical survey requirements of 192.457(b) in those areas and yet remain in compliance with that section of the regulations? If yes, what is rationale?

Section 192.457(b) requires that certain pipelines be cathodically protected in areas in which active corrosion is found. "Active corrosion" is defined under Section 192.457(c) as continuing corrosion which, unless controlled, could result in a condition that is detrimental to public safety. An operator must determine areas of active corrosion by electrical survey or where an electrical survey is impractical, by the study of corrosion and leak history records, by leak detection survey, or by other methods.

Thus, determinations by an operator that an area of corrosion will not cause a condition detrimental to public safety (or that "active corrosion" is not present) must be made on the basis of an electrical survey or where an electrical survey is impractical on the basis of some other acceptable means of determining active corrosion.

The determination may not be made arbitrarily so as to avoid the requirement to run an electrical survey where it is practical to do so. The various factors relevant to deciding whether an electrical survey is

"impractical" and whether "active corrosion" is present were published in a notice in the Federal Register on July 15, 1976, a copy of which is attached.

Cesar De Leon

Attachment