

July 30, 1974

Mr. Ray Richardson
Colorado Public Utilities Commission
500 Columbine Building
1845 Sherman Street
Denver, CO 80203

Dear Mr. Richardson:

This responds to your letter of June 24, 1974, asking, with respect to uprating a pipeline, when an operator must use an incremental pressure test procedure and when the operator may use a one-step pressure test under Subpart J.

Subpart K regulates the uprating of pipelines. Sections 192.555(e) and 192.557(e), as applicable, require any increase in the maximum allowable operating pressure to be made in increments, except where a pipeline is uprated under section 192.555(d) (1). Section 192.555(d)(1) applies only to steel pipelines and involves uprating to a hoop stress of 30 percent or more of SMYS and testing in accordance with Subpart J. In this subpart, the pressure test required for pipelines operated at 30 percent or more of SMYS under section 192.505 is a one-step procedure.

We trust our response is helpful to you.

Sincerely,

Joseph C. Caldwell
Director
Office of Pipeline Safety