

July 7, 1977

Mr. Cesar DeLeon MTP-1
Acting Director
Office of Pipeline Safety Operations
Department of Transportation
Washington, D.C. 20590

Subject: Interpretation of Code Title 49
Parts 192 and 195 Relative to
Convolute Pipe Flanges

Dear Mr. DeLeon:

On June 30, 1977, I met with Mr. Paul J. Cory relative to the acceptance of Syspac, Inc., Orinda, Ca. and Nibco, Inc., Elkhart, Indiana, pipe flanges for the jurisdictional areas as defined in your Regulations for the Transportation of Natural and Other Gases and Liquids by Pipeline, Title 49, Parts 192 and 195 respectively.

Specifically Part 192.147 of Title 49 - Flanges and Flange Accessories - states that flanges must meet minimum requirements of ANSI B16.5 or the equivalent which we interpret to mean flange design per ASME Section VIII, Division 1 of the Pressure Vessel Code.

Our pipe flanges meet the requirements of Section VIII (see attached documentation). In order to provide flange users with a uniform statement and code clarification we request respectfully your interpretation of Title 49, Parts 192 and 195 in view of Section VIII flange design criteria.

We trust that the enclosed material is all encompassing for your acceptance review. Your response at your earliest convenience will be appreciated. In essence, we are hopeful of receiving from your office a statement that clearly delineates that our convolute flanges are acceptable in lieu of ANSI B16.5 flanges as long as Section VIII criteria is being met.

Awaiting your response we remain,

Yours truly,

PIPETECH, INC.

Gunter Schlicht
GS:en