



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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Ref. No. 4-1241

June 26, 2001

Richard Huriaux
Manager of Regulations
United States Department of Transportation
Federal Office of Pipeline Safety
400 7th Street, SW, Room 7128
Washington, District of Columbia 20590

Dear Mr. Huriaux:

Subject: Clarification of Title 49, Part 192.919 & Subpart J, Test Requirements

Please provide a clarification for the following situation:

An interstate transmission company has a 10 inch steel pipeline with an established maximum allowable operating pressure (MAOP) of 809 psig and a normal operating pressure of approximately 700 psig. The pipeline is in a class 2 location and operates at a hoop stress of 30 percent or more. The pipeline was recently damaged by an excavator that required the pipeline company to lower the operating pressure to 510 psig for repair. The repair required two nipples, two 10 inch split sleeve stopples, and approximately 200 feet of 10 inch steel pipeline. The 200 foot section of 10 inch pipeline was pre-tested to at least 1011 psig prior to installation as required by code. The stopples were not welded to the replacement section of pipeline; rather they were welded to the existing pipeline and used to by-pass around the damaged section to maintain gas pipeline service pressures. The stopple components were not pressure tested by the manufacturer prior to being shipped to the pipeline company because they are required to be welded together while being welded to the existing pipeline. After the stopples were welded on to the pipeline they were pressure tested by the pipeline company to 510 psig. The stopples were then hot tapped and the 200 foot section of pipeline was replaced.

To establish a MAOP of 809 psig and meet the minimum requirements of 192.619, Staff believes that these fittings and components should have been strength tested to at least 1011 psig¹ to test the integrity of the welds and comply with the code. Since these stopples are welded in place, were leak tested by the pipeline company, and are designed

¹ 809 psig X 1.25, as required for class 2 locations by the table found in 192.619(2)(ii)



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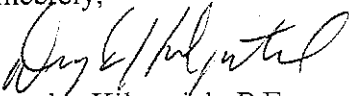
to allow pressure testing before tapping, the Commission Staff believe they are not exempted by 192.505(d) because Part 192.505(d) allows an exemption only if the component was manufactured under a quality control system, pressure tested to at least the pressure required for the pipeline (1011 psig), or strength tested to at least the pressure for the pipeline to which it is being added (1011 psig) and certified by the manufacturer. The Commission Staff believes the exemption in the code refers only to the installation of components such as valves etc. that were strength tested by the manufacturer and cannot be tested after installation without shutting down the pipeline. Our statements and question to you are:

1. The components were capable of being pressure tested to 192.619 requirements.
2. The pipeline did, in fact, conduct a limited post (Hot Tap) installation pressure test.
3. The manufacturer could not certify a strength test for the split sleeve stopples since they have to be welded together while being installed in the field.
4. Do you agree with Staff's interpretation that in order to establish an MAOP of 809 psig in a class two location the stopples should have been pressure tested before hot tapping to at least 1011 psig as required by Part 192.619?

Staff would appreciate your help in getting an official clarification resolving this issue. This clarification will assist the Washington Utilities and Transportation Commission Staff in applying the requirements of Subpart J and Part 192.619 in the future. If you have any question or need any additional information, please contact Scott Rukke, Pipeline Safety Engineer, at (360) 664-1241.

Thank you for your time and assistance.

Sincerely,


Douglas Kilpatrick, P.E.
Pipeline Safety Director