



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety Administration**

Administrator

OCT 23 2006

400 Seventh Street, S.W.
Washington, D.C. 20590

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OCT 27 2006

WASH. UT. & TP. COMM

Mr. Carl Weimer
Chair, Washington State Citizens Committee
on Pipeline Safety
P.O. Box 47250
Olympia, WA 98504-7250

Dear Mr. Weimer:

The Pipeline and Hazardous Material Safety Administration (PHMSA) received your letter dated August 10. In your letter you requested assistance in obtaining a response to an interpretation request from the Washington Utilities and Transportation Commission (WUTC).

The WUTC requested an interpretation of 49 CFR §§ 192.619 and 192.505(d). This letter is to inform you that PHMSA has responded to WUTC's interpretation request and a copy of the response is enclosed.

I would be pleased to meet with you or your staff to discuss this subject further. James Wiggins, my Associate Administrator for Governmental, International and Public Affairs (202-366-4831) would be pleased to assist with this.

Sincerely,


Thomas J. Barrett

Enclosure

Carl I apologize for the delay -
If you have any technical concerns, I
would be pleased to set you up
with our experts,
Tom Barrett



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400 Seventh Street, S.W.
Washington, D.C. 20590

SEP 18 2006

Douglas Kilpatrick, P.E.
Pipeline Safety Director
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive, S.W.
Olympia, Washington 98504-7250

Dear Mr. Kilpatrick:

Thank you for your continued interest in pipeline safety and we apologize for the delay in responding to your June 26, 2001 letter. In your letter you requested clarification of the application of the regulation § 192.619 *Maximum allowable operating pressure (MAOP): Steel or plastic pipelines*; and § 192.505(d), *Strength test requirements for steel pipeline to operate at a hoop stress of 30 percent or more of Specified Minimum Yield Strength (SYMS)*.

Section 192.619 establishes the MAOP to which a pipeline segment may operate and the test pressure to which a pipeline segment must be tested to in order to establish the pipeline's MAOP, depending on class location.

Section 192.505(d) exempts an operator from strength testing a component after installation if the component is the only item being replaced or added to the pipeline, provided the manufacturer of the component certifies that:

- The component was tested to at least the pressure required for the existing pipeline;
- The component was manufactured under a quality control system to ensure that component is at least equal in strength and tested to at least the pressure required for the existing pipeline; or
- The component carries a pressure rating established through applicable ASME/ANSI, MSS specifications, or by unit strength calculations as described in § 192.143.

In your letter, you presented the following scenario of events:

- The existing interstate transmission pipeline with an established MAOP of 809 pounds per square inch gauge (psig);
- The pipeline is in a Class 2 location and operates at a hoop stress of 30 percent or more SYMS;
- A 200 foot section of the existing pipeline was damaged and removed;
- The pipeline's operating pressure was reduced to 510 psig;


- The stopple fittings were welded to the existing pipeline;
- The stopple fittings were pressure tested to 510 psig and used to bypass the damaged section of pipe and maintain service; and
- A new 200 foot section of pipe was pressure tested to 1,011 psig and replaced the damaged section of pipe.

Based on the above information the stopple fittings that were welded to the pipeline could experience the same internal pressure as the existing pipeline. Therefore, § 192.619 requires that the stopple fittings be tested to the same pressure as the existing pipeline in order to establish a MAOP of 809 psig in a Class 2 location.

Since the stopple fittings were not pressure tested to the strength of the existing pipeline the exemption under § 192.505(d) does not apply.¹

If you have any questions, concerns, or comments, please feel free to contact me or James Reynolds, General Engineer at 202-366-2786.

Sincerely,


for Florence L. Hamm
Director of Regulations

¹ Title 49 CFR 192.505(d) (October 1, 2005) was amended in 2004 to add 49 CFR 192.505(d)(3) which states "The component carries a pressure rating established through applicable ASME/ANSI, MSS specifications, or by unit strength calculations as described in § 192.143." At the time of the June 26, 2001 request, 49 CFR 192.505(d) (October 1, 2000) would have been applicable.