

PI-73-0117

September 19, 1973

David E. Weber, P.E.
Gas Engineer and Safety Director
Cape Cod Gas Company
P.O. Box 1360
Hyannis, MA 02601

Dear Mr. Weber:

This is in response to your letter of August 27, 1973, in which you opine that the definition and interpretation of §192.457 (c), 49 CFR is ambiguous.

The purpose of this subsection was to require that cathodic protection be required where continuing active corrosion could result in a condition that is detrimental to public safety. This requirements, therefore, would exclude those areas of corrosion where other corrective action would be taken, thereby providing and exception to the cathodic protection because the active corrosion was not continuing or detrimental to public safety.

You indicate that you feel that we should make every effort to revise the section qualitatively and quantitatively. The Federal gas pipeline safety regulations have been developed, as far as practicable, as performance standards rather than design and construction specifications. They prescribe an adequate level of safety in terms of results, leaving industry free to develop and use improved technological means of meeting the requirements.

From comments and information gathered in developing the corrosion regulations, the Office of Pipeline Safety (OPS) was not able to ascertain a definitive qualitative or quantitative measurement of corrosion that could be used in determining the degree of detriment to public safety in all instances of continuing corrosion. The regulations as developed provide a performance yardstick for the gas operator to determine if the continuing corrosion in his system will be hazardous to the public.

We trust that this has answered your particular question. If we can be of further assistance, please let us know.

Sincerely,
Signed
Joseph C. Caldwell
Director
Office of Pipeline Safety

Cape Cod Gas Company
Whites Path
So. Yarmouth, Mass.
P. O. Box 1360
Hyannis, Mass. 02601

August 27, 1973

Mr. Joseph C. Caldwell, Director
Office of Pipeline Safety
Department of Transportation
Washington, D. C. 20590

Dear Mr. Caldwell:

In reviewing OPS Advisory Bulletin No. 73-7 of July 1973, it is my judgment that the definition and interpretation of 49 CFR Section 192.457 (c) is still ambiguous.

It is probable that of the minimum standards Subpart I - Requirements for Corrosion Control are the most definitive. However, to coin a colloquialism Section 192.457 (c) is a "cop-out"; and the Department should make every effort to revise the section qualitatively and quantitatively.

It is obvious that not only Subpart I but the entire standard has been promulgated to prevent "a condition that is detrimental to public safety".

Sincerely,
David E. Weber, P.E.
Gas Engineer and Safety Director