

6/23/97

Mr. Mahendra Jhala
Chief, Utilities Safety Commission
505 Van Ness Avenue
San Francisco, CA 94102

Dear Mr. Jhala:

We have considered your April 22, 1997, letter to Zach Barrett, State Liaison in the OPS Western Regional Office, that announced the grant of waiver from compliance with the corrosion control and cathodic protection requirements of 49 CFR 192.465(b) issued by the California Public Utilities Commission (CPUC) to the Pacific Gas and Electric Company (PG&E). The CPUC found that PG&E's request for deviation from CPUC General Order 112-E, § 192.465(b) to allow rectifier inspections on an annual basis instead of at intervals not exceeding 2-1/2 months is reasonable if pipe-to-soil potential measurements are performed once every two months.

We concur with the finding of the CPUC and do not object to the waiver. The waiver is consistent with the intent of § 192.465(b) requiring adequate corrosion control and monitoring for cathodic protection levels to ensure safe operation of pipeline systems.

Sincerely,

Richard B. Felder
Associate Administrator for
Pipeline Safety