

10/22/98

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65102

Dear Mr. Roberts:

We have considered the Commission's order dated July 22, 1998, granting Missouri Public Service a temporary waiver from compliance with 49 CFR 192.619(a)(2)(ii) in uprating a 3-mile segment of steel pipeline located in Nevada, Missouri. The waiver permits the maximum allowable operating pressure of the segment to be increased from 118 psig to 175 psig without pressure testing to substantiate the increased pressure, provided the segment is surveyed for leaks annually.

The waiver is needed because of increased demand and logistical problems in testing the segment, which are discussed in the waiver application. For instance, the application mentions that the segment should not be taken out of service because it is part of the city's only supply line.

As to the safety of the waiver, the segment is said to have been leak free and cathodically protected since installation. It was pressure tested to 175 psig in September 1997 when the segment was previously uprated from 60 to 118 psig. Because operation at 175 psig represents only 6 percent of SMYS, the risk of stress-related failure is minimal. Also, the requirement for annual leak surveys is 5 times as frequent as our gas pipeline safety standards require.

Under these circumstances, we do not object to the waiver. It may take effect as scheduled.

Sincerely,

Richard B. Felder
Associate Administrator for Pipeline Safety

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cc: DPS-1,2,10,Regions,TSI,STateMail