
**DEPARTMENT OF
TRANSPORTATION**

Office of Pipeline Safety Operations

[Docket No. 77-5]

PHILLIPS PIPELINE CO.

Grant of Waiver

By letter received January 27, 1977, the Phillips Pipeline Company (Phillips) requested a waiver from compliance with Federal liquid pipeline safety standards under 49 CFR 195.234(g) regarding record retention of developed film of 51 welds. Phillips stated in its petition that the film was inadvertently lost while in the possession of a radiographic technician of the independent X-ray company which performed the nondestructive testing of these welds. Phillips further stated that the film had been read by the technician and its welding inspector and had been entered in the Radiographic Inspection Log before being lost. Phillips included affidavits from both the technician and the Welding Inspector attesting to the above facts and that all 51 of the welds represented by the lost film were acceptable. Phillips also included a copy of the Radiographic Inspection Log.

Phillips has further stated in subsequent communications that:

1. The pipe is 8", seamless, 5LX FR x 42, .250 wall thickness.
2. The total length of the pipeline is 267,493.7 feet with 7,487 girth welds, all of which were X-rayed.
3. There were 352 welds rejected, 14 cut out and 338 were repaired.
4. These 352 welds were X-rayed a second time.
5. All welds represented by the 51 lost radiographs were acceptable in accordance with API 1104 (13th edition).
6. All these welds were made by one welder.
7. The pipeline was hydrostatically tested to as [sic] least 90 percent SMYS or 2192 psig, and
8. The operating pressure will be [sic] 1440 psig.

After review of the information, MTB has determined that:

1. The Radiographic Inspection Log containing the X-ray numbers, type and number of exposures taken, condition of the welds, their location, and dates taken, verifies that the welds were

acceptable in accordance with API 1104 (13th edition).

2. It would be unreasonable to require a large segment of the pipeline to be dug up and X-rayed again just to supply documentation for recordkeeping purposes, since the original affidavits and Radiographic Inspection Log will, in this instance, be sufficient documentation and will be maintained in the radiographic file for the required three years.

3. The hydrostatic testing of the pipeline further attested to the safety of the pipeline; and

4. It would not be inconsistent with pipeline safety to grant the waiver as requested.

Therefore, effective immediately, the requested waiver is granted.

(18 USC 831-835; 49 CFR 1.53(g).)

Issued in Washington, D.C. on May 5, 1977.

JAMES T. CURTIS, Jr.,
*Director, Materials
Transportation Bureau.*

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