
**DEPARTMENT OF
TRANSPORTATION**
**Research and Special Programs
Administration**

[Docket No. 82-2W; Notice 2]

**Transportation of Natural and Other
Gas by Pipeline; Grant of Waiver**

The Transcontinental Gas Pipeline Company (Transco) petitioned the Materials Transportation Bureau (MTB) by letter dated February 16, 1982, for a waiver from compliance with 49 CFR 192.245 with respect to the repair of three girth welds which had cracks in the root bead of the welds prior to repair. Section 192.245 requires that a weld in an onshore pipeline must be removed if it has a crack that is more than 2 inches long or that penetrates either the root or second bead.

The petitioner stated that the welds were between fittings that are segments of a slug catcher in a natural gas separation and dehydration facility. The facility is the terminus of the Transco Central Texas Offshore System, and is located in a Class 1 area near Markham, Texas, approximately 65 miles southwest of Houston. Because removal of the welds as cylindrical sections could not be done without damage to the fittings, and because replacement fittings would have taken as long as 6 months to deliver, the petitioner stated that interference with service would have resulted and therefore repairs were made to the welds.

Transco advised MTB that the three welds were repaired using procedures developed and documented in accordance with Section 7.0 of API Standard 1104, including the welding procedure which was qualified in accordance with Section 2.0 of API 1104 on pipe of the same grade as the fittings welded. The repaired welds were nondestructively tested in accordance with §192.243 and met the standards of acceptability of §192.241(c). The facilities were hydrostatically tested after repair as required by §192.505 at a test pressure of over 125 percent of the maximum allowable operating pressure without failure or leakage of the repaired welds. The petitioner asserted that the results of these procedures and tests demonstrated that the conditions under which the welds were repaired provided welds having mechanical properties and soundness that meet the requirements of Part 192.

Three comments were received in response to the MTB invitation to comment in Notice 1 (47 FR 39780, September 9, 1982). Comments from the Texas Eastern Gas Pipeline Company and the Interstate Natural Gas Association of America both were supportive of the granting of the waiver and did not state further reservations or conditions. The third commenter, UNC Naval Products, a Division of the United Nuclear Corporation, questioned "since the welds were between fittings rather than pipe sections, was a specific weld/welder qualification performed by Transco for this special joint?" The commenter added that "The lack of special recognition for welding these special types of joints could be the base cause of the weld defects," and "Based on the above, the proposed relaxation should be allowed only on special joints for which a specific qualification was successfully performed."

MTB had previously recognized the possibility that weldability of the header segments in question could vary from that of the pipe as a result of chemistry differences or differences in manufacturing process, size, or geometry, and had made inquiries of Transco to assure that this possibility was not a factor that would require a special welding/welder qualification. The MTB found that the header segments were manufactured to the same X-60 material specifications as the pipe in the system, and that other variables were within the limits of the essential variables of Section 2.0 of API Standard 1104 such that a specific welding procedure for the pipe-type fittings was not necessary. Therefore, UNC Naval Products' comment to the effect that lack of recognition of special types of joints may be the cause of the defects is not relevant, since the joints repaired were similar to other pipe joints welded within the requirements of Section 2.4.c of API Standard 1104. That section requires requalification of the welding procedure only if there is a major change in joint design. A copy of the telephone report covering this point is in the docket.

On the basis of the foregoing and the reasons cited in Notice 1, the MTB believes that the repaired welds in the Transco facility have the same level of safety as welds made under literal compliance with 49 CFR Part 192 and have been demonstrated by radiographic examination and hydrostatic testing to have the necessary soundness, strength, and ductility consistent with design and oper-

ating requirements of the facility. The MTB further believes that to require the removal of the repaired welds would burden Transco with unnecessary operating delays and needless additional costs to the operator and consumers without enhancing the safety of the facility. Therefore, the MTB grants to Transco the requested waiver from compliance with the weld removal requirements of 49 CFR 192.245 for the repaired welds as described in Petition No. 82-2W, effective immediately.

(49 U.S.C. 1672; 49 CFR §1.53(a); Appendix A of Part 1, and Appendix A of Part 106)

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