



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

400 Seventh Street, S.W.  
Washington, D.C. 20590

**FEB 24 1997**

Mr. H. Russell Frisby, Jr.  
Chairman  
Maryland Public Service Commission  
William Donald Schaefer Tower  
6 St. Paul Street  
Baltimore, MD 21202-6806

Dear Mr. Frisby:

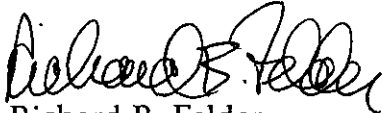
We have considered your letter of December 20, 1996, notifying us the Commission will grant Washington Gas a waiver from complying with 49 CFR 192.619(a)(2)(ii) for five segments of its gas distribution system. The waiver will permit Washington Gas to maintain the current maximum allowable operating pressure (MAOP) on each of the five segments.

The waiver is needed because, in the period 1976 through 1979, Washington Gas uprated the five segments to pressures higher than the maximum pressure allowed by 49 CFR 192.619(a)(2)(ii). This maximum applied to the segments because under 49 CFR 192.553(d) an existing pipeline may not be uprated above the pressure allowed for a new segment of pipeline constructed of the same materials in the same location. And newly constructed steel pipeline segments to be operated above 100 psig may not exceed the pressure under § 192.619(a)(2)(ii).

The Washington Gas waiver request shows that of the five segments, four were uprated to pressures marginally above the allowable maximum (segments 8-1, 8-2, 9-1, and 12-5). However, the uprated pressure of the 6-inch line in segment 21-1 (300 psig) exceeds the allowable maximum by 40 percent, a level that provides no margin of safety under the test pressure (300 psig). Similarly tested lines in segments 8-2 and 9-1 have uprated pressures of 240 psig. In addition, the waiver request shows the hoop stress level of the segments is below 30% of SMYS and the segments have operated safely since uprating. Under these circumstances, we do not object to the waiver provided the Commission requests Washington Gas to reduce the MAOP of the 6-inch line in segment 21-1 to 240 psig. This MAOP would conform the line to the other similarly tested lines under the waiver without affecting its normal operation. Any higher MAOP would have to be achieved through additional pressure testing.

Therefore, under 49 U.S.C. § 60118(d), unless the Commission modifies the waiver as described above for the 6-inch line in segment 21-1, the Commission's action with regard to the 6-inch line is stayed. Within 90 days the Commission may appeal this matter in writing and request an opportunity for a hearing.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard B. Felder". The signature is cursive and somewhat stylized, with the first name being the most prominent.

Richard B. Felder

Associate Administrator for Pipeline Safety

STATE OF MARYLAND

**PUBLIC SERVICE COMMISSION  
ENGINEERING DIVISION**

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October 30, 1996

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Mr. Richard B. Felder  
Associate Administrator For Pipeline Safety  
DOT/RSPA/OPS  
400 7th St., S.W. - Room 2335  
Washington, DC 20590

**PSC ENGINEERING  
DRAFT**

Dear Mr. Felder:

Attached is a request from Washington Gas (WG) for a waiver from requirements of 49 CFR<sup>1</sup> 192.619(a)(2)(ii). The waiver is requested to allow WG to continue to operate portions of its natural gas distribution system at existing pressures.

The Maryland Public Service Commission (PSC) has reviewed the waiver request, supporting documentation and maintenance records in detail. Based on these reviews, the PSC finds that granting this waiver is not detrimental to public safety.

The Commission will notify WG that the waiver is approved, effective sixty days from the date you receive this letter, unless you formally object within the sixty-day period.

If you have any questions concerning this action, please contact Alex Dankanich, Assistant Chief Engineer, Gas Pipeline Safety at (410) 767-8082.

Sincerely,

**PSC ENGINEERING  
DRAFT**

H. Russell Frisby, Jr.  
Chairman

Enclosure

cc: Alex Dankanich, Assistant Chief Engineer, Gas Pipeline Safety

<sup>1</sup> Code of Federal Regulations