



DEPARTMENT OF TRANSPORTATION
MATERIALS TRANSPORTATION BUREAU
WASHINGTON, D.C. 20590

Docket

DEC 20 1976

Mr. John Callahan
State of Rhode Island
and Providence Plantations
Division of Public Utilities
and Carriers
Providence, Rhode Island 02903

Dear Mr. Callahan:

This refers to the Division's action dated June 23, 1975, (OPSO Docket No. RI-75-1), granting the Providence Gas Company (PGC) a waiver from compliance with the corrosion control requirements of 49 CFR 192.455(a) for Type 316 stainless steel fittings manufactured by Amp, Inc. for use in plastic pipelines.

The Office of Pipeline Safety Operations (OPSO) stayed the action by telegram dated August 25, 1975, basically on the grounds that the information presented by the Division in support of its action did not show that the soils in which the fittings would be used in Rhode Island were not corrosive to Type 316 stainless steel.

On October 17, 1975, the Division appealed the stay, based on additional information provided by PGC in support of its need for a waiver. Concurrent with receipt of the appeal, we were considering rulemaking on the same subject matter as the waiver. Consequently, we delayed deciding the appeal until a notice of proposed rulemaking was issued to avoid possible inconsistent actions. Enclosed is a copy of Notice 76-1 issued September 22, 1976, in Docket OPSO-37, proposing to exempt certain small alloy fittings from Section 192.455.

Our review of the additional information submitted indicates that PGC has conducted surveys in typical areas where it plans to use the fittings to determine whether or not soil resistivity and soil pH were conducive to creating a corrosive environment to Type 316 stainless steel. Based on PGC's operating history, and the results of the surveys as correlated with the "Engineering Soil Survey of Rhode

Island” produced by the University of Rhode Island Experiment Station, it appears that the corrosivity of soils in the area of use would be detrimental to small Type 316 stainless steel fittings installed in plastic pipelines. Therefore, we determined that the requested waiver may be granted by the Division subject to the following conditions:

- A. Each fitting installed under this waiver—
 - 1. May not have a size greater than that required for 2 inch minimal size plastic pipe;
 - 2. Must be designed to prevent leakage caused by localized corrosion pitting;
 - 3. Must be electrically isolated when installed;
 - 4. Must have its location identified in a manner that still will assure future identification of that location; and
 - 5. Must provide a 95 percent confidence level of corrosion control and reliability based on statistical inspection sampling of those fittings installed by year at intervals not exceeding 3 years.
- B. Findings resulting from inspections under condition A. 5. must be submitted in writing to the Division. In addition, PUC must immediately report to the Division any failure of a fitting installed under this waiver resulting from corrosion.
- C. The waiver terminates upon the effective date of a final rule resulting from Motion 76-1 in Docket OPSO-37 to ensure that the fittings installed under the waiver will only be subject to the provisions of that Final rule.

Sincerely,

Signed Cesar DeLeon
Acting Director
Office of Pipeline

MTP-30; GM; LMF; peg; 11/15/76
TEW: TGC-50; 11/29/76, REW: GM; 12/2
REW: LMF; 12/8 & REW: GM; 12/9/76
cc: MTP-1, 10, EA
file: RI-75-I
Enclosure