Let’s Talk Records!!
§ 192.607 Verification of Pipeline Material: Onshore steel transmission pipelines.

(a) **Applicable Locations.** Each operator must follow the requirements of paragraphs (b) through (d) of this section for each segment of onshore, steel, gas transmission pipeline installed before [insert the effective date of the rule] that does not have reliable, traceable, verifiable, and complete material documentation records for line pipe, valves, flanges, and components and meets any of the following conditions:

(i) The pipeline is located in a High Consequence Area as defined in 192.903; or

(ii) The pipeline is located in a class 3 or class 4 location
Validate Pipeline Material

- Diameter
- Wall Thickness
- Grade (yield and ultimate tensile)
- Chemical Composition
- Coating Type
- Seam
(a) **Applicable Locations.** The operator of a pipeline segment meeting any of the following conditions must establish the maximum allowable operating pressure using one or more of the methods specified in § 192.624(c)(1) through (6):

(2) Pressure test records necessary to establish maximum allowable operating pressure per subpart J for the pipeline segment, including, but not limited to, records required by § 192.517(a), are not reliable, traceable, verifiable, and complete and the pipeline is located in one of the following locations:

(i) A high consequence area as defined in § 192.903; or

(ii) A class 3 or class 4 location
Validate Pressure Tests

- Test Pressure
- Test Duration
- Test Medium
- Test Location
  - ✓ Elevation of Deadweight Tester
- Test Date
  - ✓ Witness Signed and Dated
Records which can be clearly linked to original information about a pipeline segment or facility.

- Pipe mill records
- Purchase requisitions
- As-built documentation indicating:
  - Minimum pipe yield strength
  - Seam type
  - Wall thickness
  - Diameter

- Careful attention must be given to records transcribed from original documents because they might contain errors. Information from a transcribed document must be verified with complementary or supporting documents.
Records where information is confirmed by other complementary, but separate, documentation.

- Contract specifications for a pressure test of a line segment complemented by pressure charts or field logs.
- Purchase order to a pipe mill with pipe specifications verified by a metallurgical test of a coupon pulled from the same pipe segment.

In general, the only acceptable use of an affidavit would be as a complementary document, prepared and signed at the time of the test or inspection by an individual familiar with the test or inspection.
Complete

Record is finalized as evidenced by a signature, date, or other appropriate marking.

- A complete pressure testing record:
  - ✔ Identifying a specific segment of pipe
  - ✔ Who conducted the test
  - ✔ Duration of the test
  - ✔ Test medium
  - ✔ Pressure readings
  - ✔ Elevation information

An incomplete record might reflect that the pressure test was initiated, failed, and restarted without conclusive indication of a successful test. A record that cannot be specifically linked to an individual pipe segment is not a complete record for that segment. Incomplete or partial records are not an adequate basis for establishing MAOP. If records are unknown, a more conservative approach is indicated.
Traceable, Verifiable, and Complete Records

**Traceable** – The original record/document where diameter, wall thickness, grade, etc. comes from.

**Verifiable** – Find another source document that verifies the information found on the primary document.

**Complete** – Is there a source document that is signed and dated to validate that the material was received & installed or the test was done?

This is a report – NOT A SOURCE RECORD!
Traceable & Verifiable Records

Primary
- Mill Test Reports
- Factory Test Reports
- As-built Drawings with Bill of Materials
- Pipeline Weld Maps with Heat #’s
- Pressure Test Reports

Secondary
- As-built Survey
- Redlined Construction Drawings
- Pipeline Inspection Report
- Purchase Order

Tertiary
- Issued for Construction Drawings
- Historical Alignment Sheet
- Purchase Requisition
- Photographs
- Affidavit
Complete Records  ➔  Quality

**Highest Quality** ★★★★★

Material Record shows manufactured specifications, that the material was delivered and received for a particular job or project.

- Mill Test Reports, Factory Test Reports
- Survey Notes, Inspector’s Daily Reports (signed & dated)

Pressure Test Record shows dead weight log and charts, pressure, medium, duration, elevations, and test supervisor name, signed & dated.

**Lowest Quality** ★

Material Records that shows manufactured specifications but lacks proof of delivery or installation for a particular job or project.

- Purchase Order without proof of receipt
- Project Close Out Report
- Bill of Materials without As-built stamp
- Historical Alignment Sheet

Pressure Test Record shows pressure, medium, duration, and test supervisor name.
Questions?

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