

# TR 2020-16 – Note under 192.925

Nov 3, 2021 – Editorial Section

Approved revisions to guide material §192.925. Editorial changes approved by IMP/Corr TG to LB2-2021 version to address Disapproved votes are shown in yellow highlight, and the 3 Disapproved votes (Friend, Kottwitz, Miller) in LB2-2021 are copied at the end. For IMP/Corr TG, Tim Strommen sent an email on 11/2/2021 to 3 Disapproved voters (copy to gptc@aga.org) with instructions for changing vote from Disapproved to Approved by email. **Ready for GPTC Secretary Review to determine if any other action is needed prior to Publication.**

<b>TR Number</b>	<b>2020-16</b>
<b>Primary</b>	192.925
<b>Purpose</b>	Clarify the statement in 5.4(a) and evaluate appropriateness of “shall” in same sentence. See LB2-2020 TR 19-30 comments.
<b>Origin/Rationale</b>	TR initiated to address comment from Mary Friend related to TR 19-30 Suggested edits:  <i>5.4 Evaluations of remaining strength in pipe wall.</i> (a) Corrosion defects. In accordance with NACE 5.5.1, the pipeline operator shall evaluate or calculate the remaining strength at locations where corrosion defects are found <b>(192.925(b)(3))</b> .
<b>Assigned to</b>	IMP/Corr Task Group
<b>LB2-2021</b>	27 approved, 1 approved with comment, 3 disapproved

**Note:** Editorial Revisions by TG to LB2-2021 version to address Disapproved votes are shown in yellow highlight.

## Section 192.925

Note: References to NACE throughout this section of guide material are specific to the edition of NACE SP0502 as incorporated by reference (IBR) in §192.7. Abbreviated references are used in guide material below. Example: "NACE 5.2.1" means NACE SP0502, Paragraph 5.2.1 of the IBR edition. See 3 of the guide material under §192.907. **NACE SP0502 is an IBR standard; therefore, “shall”, “requires”, or “must” statements in this section of guide material with specific reference to NACE SP0502 are required to be followed per §192.925(b).**

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LB2-2021 - 3 Disapproved votes:

**Mary Friend - Disapproved with Comment:** While the proposed language is correct, I am not sure that the proposed language addresses my issue. My issue is the use of "SHALL evaluate or calculate the remaining strength at locations where corrosion defects are found". While NACE RP section 5.5.1 states that "the operator shall evaluate the condition of the coating and pipe at each excavation location", this section does NOT require R-Streng, only evaluation. GPTC has changed this to state that all corrosion shall have the remaining strength calculated. Further, 192.925(b)(3) states the plans procedures must include for direct examination of indications I believe the header of 5.4 should be changed to Evaluation of Indications. The first

step of the process is to document the indications as required by Section 5.5.1. Then if corrosion is found, it needs to be evaluated for remaining strength as per the requirements of 192.485 I would suggest the following to address my disapproval "If corrosion is found at indications, the operator should evaluate the remaining strength in accordance with 192.485. " The language regarding "SHOULD" in IBR documents becoming "shalls or musts" should also be added to GM for 192.7. I would suggest a new TR to address the should/shall requirement in 192.7.

**John Kottwitz – Disapproved with Comment:** Discussed with Lane that changes to correct would be more than editorial, so not changed at Editorial Section. This needs further clarification since the proposed wording implies the guide material is mandatory and must be followed in those cases. Rather, we are trying to explain that NACE SP0502 is an IBR standard and therefore can be the basis for mandatory statements in the guide material, similar to when we give a code section as the basis for a mandatory statement in guide material. Clarification of this in a manner that does not say GM must be followed will resolve my disapproved vote. One option is changing proposed new sentence to something like "NACE SP0502 is an IBR standard; therefore, NACE SP0502 can be the basis for "shall", "requires", or "must" in this guide material for statements that are required to be followed per §192.925(b)."

**Lane Miller – Disapproved with Comment:** The guide doesn't require the actions, the regulations do. Need to remove "in this guide material" from the new sentence.