

TR Number	2023-06
Primary Reference	192.65
Secondary Reference	GMA G-192-17
Purpose	Consider relocating material in relating pipe testing records to 192.65 in the Table in GMA G-192-17 to the GM for 192.65 and eliminating the Note “No Guide Material Necessary” in GM 192.65.
Origin/Rationale	192.65(a)(2) was removed in Amdt 192-120 in 2015, removing the allowance for pressure testing in lieu of transporting steel pipe in accordance with API RP5LI. However, some steel pipe transported prior to the removal of the allowance in 192.65(a)(2) may have been pressure tested to satisfy the Rule, records of those tests should still be retained by the operator for the life of that pipeline. Discussion in the Design TG at the July 2022 meeting, and Comments received in LB1-2023 for TR 21-02, show support that the revised GM appears to fit better in GM 192.65 than in GMA G-192-17.
Assigned to	Design TG

Note: Revisions are shown in **yellow highlight** and **red font**.

Section 192.65

~~No guide material necessary~~

Pipe transported by railroad before November 12, 1970, may have been qualified for use by pressure testing prior to October 1, 2015 (refer to Amendment 192-120), so the operator should retain records of those tests.

GMA G-192-17

GUIDE MATERIAL APPENDIX G-192-17

(See Part 191 and guide material under §§192.13, 192.603, 192.605, 192.941, and 192.947)

EXPLICIT REQUIREMENTS FOR REPORTS, INSPECTIONS, TESTS, WRITTEN PROCEDURES, RECORDS, OR SIMILAR ACTIONS

1 EXPLICIT REQUIREMENTS TABLE

Part 191 and Part 192 include requirements for reports, inspections, tests, written procedures, records, and similar actions on the part of the operator. The table in this Guide Material Appendix is a listing of each regulation section that clearly and precisely states such requirements and the actions to be taken. The operator is advised that other types of required actions are not intended to be included in this listing. The term "written" is only included in the "Requirements" column where explicitly used in the regulation section, even though it might be otherwise implied. The table does not include other requirements contained in documents that are incorporated by reference.

This table is provided as an aid and does not remove operator responsibility concerning adherence to the Regulations, whether required, implied, prudent, or practical.

2 ADDITIONAL GUIDELINES FOR RECORD RETENTION AND SECURITY

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TR 2023-06 – Transportation of Pipe

Subpart	Section	Subject	Requirements	
Materials	B	192.55(c)	Steel pipe	Visual examination, weldability test
		192.63	Marking of materials	Material marking
		192.65	Transportation of pipe	<p>Test</p> <p>NOTE: Pipe transported by railroad before November 12, 1970, may have been qualified for use by pressure testing prior to October 1, 2015 (refer to Amendment 192-120), so the operator should retain records of these tests.</p> <p><i>[LB note: Green font was approved in TR 21-02.]</i></p>