

Per our phone conversation this morning, I discussed your questions with the technical staff. I asked them to prepare a reply to the change from 12 to 6 month qualification requirement. Please review the reply and let us know if you have any questions, need more information, want to discuss further etc...

Thanks

Current draft requires that:

(iv) Appendix C welders must be requalified at least twice annually, but not to exceed seven and one-half months between qualification tests.

Reasoning and intent behind this change.

1. Title 49, CFR Part 192.229(b) puts the following limitation on all welders:

(b) No welder may weld with a particular welding process unless, within the preceding 6 calendar months, he has engaged in welding with that process.

Oxyacetylene welders are generally tested and qualified to appendix C requirements. Since Appendix C welders are only required to test once per year, not to exceed 15 months, AND most operators historically have not tracked production welds, operators were unable to show compliance with Part 192.229. Many operators use employees for various other duties and since fusion accounts for the majority of joining, those employees may not weld with a particular process therefore they lost their "qualification".

2. The tests outlined in Appendix C are based on an outdated criteria. The Federal Office of Pipeline Safety is considering disallowing this criteria. Since this criteria is less stringent than ASME or API, Staff feel it is warranted to require a higher frequency test interval than that specified in Appendix C.

3. At the beginning of this rule making process Staff requested data from all operators in Washington State. The results of this data indicated that Appendix C (generally Oxyacetylene) welders had a higher failure rate than ASME and API welders. Staff were concerned about the quality of the work of some welders that have welded all year and then could not pass an annual test. Testing on a 6 month basis will ensure that poor quality welds are not installed for longer periods of time. It should also provide a better quality of welders.

4. This new draft rule was a compromise reached after initial comments were received from operators. The initial draft of the new state rules eliminated any Appendix C welders and required all welders to qualify to API or ASME criteria. The new draft rule still disallows the testing of arc welders using Appendix C.

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