



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

DEC 08 2009

Mr. Cliff Johnson
Director, Public Affairs
NACE International
1440 South Creek Drive
Houston, TX 77084-4906

Dear Mr. Johnson:

Thank you for your letter dated February 11, 2009 regarding the latest edition adoption of API and NACE standards into 49 CFR Parts 192 and 195.

I'd like to first thank you for your leadership as the current Chair of the Pipeline Standards Developing Organization Coordinating Council (PSDOCC). The coordination on standards and related research via the PSDOCC is enabling the rapid movement of knowledge into critical standards and keeping them very relevant in addressing our mutual challenges with the pipeline industry.

I'm please to inform you that the following standards you identified were all included as part of our July 2009 rulemaking entitled "Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Edits" (Docket No. PHMSA-2008-0301):

API Spec 5L 44th Edition;
API 1104 20th Edition;
NACE RP0502-2002; and,
NACE SP0169-2007 (formerly RP0169).

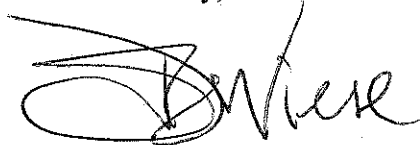
These standards will be Incorporated by Reference (IBR) after a vote by our Safety/Technical Advisory Committee this December. We would then move to final rulemaking and codification.

Referring to your suggesting of incorporating the latest edition, we agree that having the latest technical information available is a best case scenario. Unfortunately there are sometimes specific language in newer standard editions that do not align with our regulatory mission. This means we must keep previous editions IBR until differences are resolved. We communicate our exceptions while participating with Standards Developing Organization (SDO) committee meetings and during the Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Edits rulemaking.

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We remain committed and will continue participating with as many SDO committees as our resources permit. In addition, we will continue reviewing standards when appropriate for possible IBR. Please contact my National Standards Coordinator Mike Israni (202-366-4571) with any questions you may have.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Wiese". The signature is stylized with a large, circular flourish on the left side.

Jeff Wiese
Associate Administrator for Pipeline Safety