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UNION PACIFIC RAILROAD COMPANY

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DEPT. OF TRANSPORTATION
DOCKETS
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FEDERAL RAILROAD
ADMINISTRATION
OFFICE OF CHIEF COUNSEL
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FRA Docket Clerk
Federal Railroad Administration
400 Seventh St., SW
Washington, DC 20590

Gentlemen:

The Union Pacific Railroad Company (UPRR) respectfully requests a waiver of 49 CFR Parts 229.49(a)(1) and 232.103(o)(2). These regulations provide that each locomotive shall have a safety valve on the main reservoir preventing accumulation of more than 15 psi above the "maximum working air pressure."

UP seeks the authority under the proposed waiver to continue to have the main reservoir safety valve set at 150 psi, but with a maximum working air pressure of 125 psi, or a 25-psi differential.

Years ago, going back at least to the late 1970s, UPRR reduced its maximum working air pressure from the traditional 135 psi to 125 psi, changing the air compressor governor setting accordingly to a cut in/cut out pressure of 120/130 psi, as appropriate under FRA regulation 229.49(a)(1) and 232.103(o)(2). This change was made in the wake of the oil shortages of the 1970s in an effort to conserve fuel. As all railroads did not make this change, it was necessary to leave the safety valve set for 150 psi so that these valves did not pop continuously when UP locomotives were operated in multiple with those of foreign lines with the higher working air pressure settings. UPRR requested a waiver on this matter on February 18, 1997. We received an acknowledgement letter from the FRA dated March 7, 1997, with the Waiver Petition Docket No. LI-97-1 and PB-97-1.

There would be no changes in our operating practices. There are no adverse effects concerning the safety of operations. As earlier stated, this condition has existed for at least thirty years, with no ill effect. A greater margin of safety is in fact provided between the maximum working air pressure and the safety valve setting, going from a margin of 15 psi to 25 psi. Safety is in no way compromised; the maximum pressure that may exist in the main reservoir remains at the levels that have always existed--150 psi (155 in the case of the SP). The reservoirs themselves were not changed; they carry the

same burst pressure limits they always did. The necessary differentials between maximum brake pipe pressure and air compressor cut in/cut out have been maintained.

The reduction of the maximum working air pressure is not the issue as the carrier sets this. The only issue is the difference between the maximum working air pressure and the safety valve setting.

Fuel consumption will be favorably affected by approval of this waiver request, due to not having the air compressor cut in for so long as is required to maintain the higher pressure. In addition, the environment is also favorably impacted through the consumption of less fuel.

The proposed change will conform to the FRA Rules, Standards and Instructions except where it is at variance with Parts 229.49(a)(1) and 232.103(o)(2) as stated in the application. There is no negative effect on safety or on those goals established by the FRA.

Sincerely,



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DEPT. OF TRANSPORTATION