**Date Distributed:** 



THE NATIONAL BOARD

OF BOILER AND
PRESSURE VESSEL
INSPECTORS

# NATIONAL BOARD SUBGROUP REPAIRS AND ALTERATIONS

# **AGENDA**

Meeting of July 14<sup>th</sup>, 2020 Louisville, KY

The National Board of Boiler & Pressure Vessel Inspectors 1055 Crupper Avenue Columbus, Ohio 43229-1183

Phone: (614)888-8320 FAX: (614)847-1828

#### 1. Call to Order

8:00 AM

#### 2. Introduction of Members and Visitors

#### 3. Check for a Quorum

#### 4. Awards/Special Recognition

Ms. Kathy Moore – 5 Year Award Pin Mr. Tom White – 5 Year Award Pin

#### 5. Announcements

The National Board will be hosting a reception for all committee members and visitors on Wednesday evening at 5:30pm at the SKY Grand Terrace on the 16<sup>th</sup> floor of The Brown Hotel.

#### 6. Adoption of the Agenda

### 7. Approval of the Minutes of the January 14th, 2020 Meeting

The minutes are available for review on the National Board website, www.nationalboard.org.

#### 8. Review of Rosters (Attachment Pages 1-3)

#### a. Membership Nominations

i. Mr. Trevor Seime (Jurisdictional Authorities), Mr. Scott Chestnut (Users), and Mr. Paul Davis (Manufacturers) have expressed interest in becoming members of Subgroup R&A.

#### b. Membership Reappointments

i. The following Subgroup R&A memberships are set to expire prior to the January 2021 NBIC meeting: Mr. Brian Boseo, Mr. Ben Schaefer, and Mr. Rob Troutt.

#### c. Officer Nominations

i. Mr. Brian Boseo's and Mr. Ben Shaefer's terms as Chair and Vice Chair are set to end on July 30, 2020. They are both eligible for reappointment to those positions.

#### 9. Interpretations

Item Number: 19-26 NBIC Location: Part 3, 3.3.2 Attachment Pages 4-5

General Description: Clarification on welding repairs on appendages

**Subgroup:** Repairs and Alterations

Task Group: None Assigned.

**Explanation of Need:** The original submitter of this item will sometimes need to perform a welding repair on an appendage (not on the tank itself) in order for the complete process of refurbishment to be done for their customers' expectations. There appears to be no direct reference to these types of minor welding repairs for the refurbishment process in the NBIC code.

**January 2020 Meeting Action:** Mr. P. Shanks discussed his revised proposal for consideration at the Subcommittee R&A meeting. No action taken.

Item Number: 20-3 NBIC Location: Part 3, 3.3.4.8 Attachment Pages 6-7

General Description: Inspector involvement in Fitness-for-Service Assessments

**Subgroup:** Repairs and Alterations

Task Group: J. Siefert (PM)

#### **Explanation of Need:**

The below questions are intended to gain clarity as to first which Inspector (i.e. "IS" Commissioned or "R" Endorsement) signs the FFSA Form NB-403 when an "R" Certificate Holder is involved with a repair in that region as well as determine what level of review of the Fitness-for-Service the Inspector is expected to complete. If it is an Inspector holding a "R" Endorsement with an AI Commission (not tested on NBIC Part 2), shouldn't the relevant pages in NBIC Part 2 concerning Fitness for Service be included in their tested body of knowledge, so they are aware of the detailed rules?

The Body-Of-Knowledge for National Board Inspectors holding either an "IS" Commission or "R" Endorsement does not reference ASME FFS-1/API 579 Fitness-For-Service Standard or have any expectation that the Inspector be capable of determining if the correct Fitness for Service methodology was used or that the assumptions taken by the Engineer in the analysis were the most appropriate or accurate. Clarification is also requested due to the Form NB-403 signature block stating "Verified by" for the Inspector without any other disclaimers as typically found on other Forms signed by Inspectors such as ASME MDRs and NBIC Form R-1/R-2.

**January 2020 Meeting Action:** Mr. G. Galanes presented and discussed the possibility of adding FFS assessment activities into Part 3 under a new Action Item. Mr. Siefert discussed the proposal. No action taken.

#### **New Interpretation Requests:**

Item Number: 20-11 NBIC Location: Part 3, 3.3.3 Attachment Page 8

General Description: Scope of Repairs

**Subgroup:** Repairs and Alterations

Task Group: None assigned.

#### **Explanation of Need:**

NBIC Part 3 lists several examples of repair but nowhere limits the scope or amount of these examples that can be utilized when performing repairs. This creates some uncertainty when performing some types of repairs, such as replacing the tubesheets of a fixed tubesheet type heat exchanger as listed in 3.3.3 e). According to ASME BPV Code Section VIII Division 1 Part UHX, Section 13, the length of the tubes is a design parameter and therefore replacing the tubesheet in accordance with its original design might require the replacement of the tubes as well to maintain the original design length.

Item Number: 20-14 NBIC Location: Part 3, 3.3.3 & Attachment Pages 9-10 5.12.4.1

General Description: Mechanical Repair with no welding

**Subgroup:** Repairs and Alterations

Task Group: None assigned.

#### **Explanation of Need:**

ASME Section VIII, Division 3 Code stamped "Parts" are being replaced with new ASME Code stamped "Parts" without any documentation. The original ASME Data Report listed the original "Part" serial number and will no longer be accurate if the original "Part" is replaced.

Item Number: 20-17 NBIC Location: Part 3, 3.3.3 Attachment Page 11

**General Description:** Weld build of wasted areas with different material

**Subgroup:** Repairs and Alterations

Task Group: None assigned.

#### **Explanation of Need:**

It is common practice to weld build the wasted area of a component with original material and then to overlap with a corrosion resistant material to prevent future wasting of the component. It would be more efficient to simply restore the wasted area with the corrosion resistant material, provided that it meets or exceeds the strength requirements of the original material.

Item Number: 20-21 NBIC Location: Part 3, 4.4.1 e) Attachment Page 12

**General Description:** Combination of NDE methods

**Subgroup:** Repairs and Alterations **Task Group:** None assigned.

#### **Explanation of Need:**

Clarification on the intent of 4.4.1 e) 1-5 when using VT and another NDE method but on separate welds.

Item Number: 20-23 NBIC Location: Part 3, 3.4.5.1 b) Attachment Page 13

**General Description:** Alteration of ASME Section VIII Div.2 vessels

**Subgroup:** Repairs and Alterations

**Task Group:** None assigned.

#### **Explanation of Need:**

Many Div.2 vessels which are in need of repair are of sufficient age whereby all of the original paperwork was paper work. Even with the best efforts such documents can become damaged or lost by the flooding event associated with the gulf coast hurricane events and or the types of refinery fires that are all too common. In a good deal of cases these vessels simply need a new B-16.5 weld neck flange or a gasket surface weld metal build up in order to allow continued leak free surface but due to some documents being unavailable the owner is left to choose between making no repair or making a repair which is not compatible with the NBIC.

Item Number: 20-24 NBIC Location: Part 3, 3.3.5.1 a) Attachment Page 14 & 3.4.5.1 a)

**General Description:** Certification of repair or alteration plans

**Subgroup:** Repairs and Alterations

Task Group: None assigned.

#### **Explanation of Need:**

3.4.5.1 b) allows for the UDS to be revised if a proposed alteration plan is not compatible with the original. this revised UDS must be certified by an engineer as must the Alteration plan, there currently does not appear to be a separation of the two certifying activity's which is not in the spirit of Div.2 requiring different engineers for the UDS and MDR.

Item Number: 20-29 NBIC Location: Part 3, 3.4.4 Attachment Page 15

General Description: PV Cycles of operations change as an alteration

**Subgroup:** Repairs and Alterations

**Task Group:** None assigned.

#### **Explanation of Need:**

Isostatic Presses in particular (but found in other pressure vessels also) are restricted by the data report to a finite number of cycles. Operators of these vessels routinely use curves to modify what is considered a cycle and extend the life of the vessel. These vessels represent a substantial risk of failure and this practice is very difficult for the inservice inspector to successfully track and audit to ensure the integrity of these vessels are maintained as this is a grey area in the current code as written.

#### 10. Action Items

Item Number: NB15-1405 NBIC Location: Part 3, 1.2 Attachment Pages 17-18

General Description: Impact testing of P-11B Material

Subgroup: SG Repairs and Alterations

Task Group: N. Carter (PM), P. Davis, G. Galanes, P. Shanks

**January 2020 Meeting Action:** Mr. N. Carter presented his proposal intended to go to Review and Comment Letter Ballot. A motion to send to SG R&A LB for Review and Comment was made,

seconded, and unanimously approved.

Item Number: 17-134 NBIC Location: Part 3, Section 5 No Attachment

General Description: Proposed Revision for registration of Form R-1 with the National Board

containing ASME pressure part data reports attached.

**Subgroup:** Repairs and Alterations

Task Group: P. Shanks (PM), Rob Troutt, Joel Amato, Kathy Moore, Paul Edwards

January 2020 Meeting Action: Mr. P. Shanks presented a Progress Report.

Item Number: 18-66 NBIC Location: Part 3, Section 5 No Attachment

**General Description:** Move Report Forms to a new Supplement

**Subgroup:** SG Repairs and Alterations

Task Group: Marty Toth – PM, Ben Schaefer

**January 2020 Meeting Action:** Mr. M. Toth presented the changes to move Report Forms and instruction to new Supplement. A motion to move the 5 pages of revisions to Letter Ballot for SG R&A was made, seconded, and unanimously approved.

**Update:** This item is currently out for ballot to the Main Committee.

Item Number: 18-100 NBIC Location: Part 3, 3.3.2 Attachment Pages 19-22

General Description: Revision adding heat exchanger tubes with an outside diameter of 34" or smaller

to NBIC Part 3.3.2 Routine Repairs

**Subgroup:** Repairs and Alterations

Task Group: M. Toth (PM)

January 2020 Meeting Action: Mr. M. Toth was selected as the new PM since Mr. Martinez is no

longer on the SG R&A. This was a Progress Report.

Item Number: 19-16 NBIC Location: Part 3, 3.3.2 e) Attachment Page 23

**General Description:** Reword to provide clarity; contradictory requirement Part 3; 3.2.2 e)

**Subgroup:** Repairs and Alterations

Task Group: T. White

**Explanation of Need:** This wording of this clause is causing confusion. The original submitter has had multiple instances where owners have requested to purchase welded replacement parts directly and read this clause with the belief that they can purchase a replacement part for in some cases a welded pressure part for an ASME Section I boiler and safe money by having the fabricator not Hydro test as per Section I even when it was not impractical to have the testing performed.

**January 2020 Meeting Action:** Mr. P. Davis presented a Progress Report.

Item Number: 19-60 NBIC Location: Part 3, 1.5.1 No Attachment

General Description: Quality System For Qualification For The National Board "R" Certificate

**Subgroup:** Repairs and Alterations

**Task Group:** Ray Miletti (PM), Paul Davis

**Explanation of Need:** Part 3, 1.5.1 provides a good outline for a Quality Systems Manual. However, the remaining elements of a Quality System, outside of the one's currently being addressed in Item 19-47 and 19-4 need to be embellished to provide a more auditable description of each element.

**January 2020 Meeting Action:** Mr. Boseo commented that Items 19-47 and 19-48 were both closed and the scope for this item expanded to address all elements in 1.5.1. The attached proposal addresses only calibration. This was a Progress Report.

Item Number: 19-61 NBIC Location: Part 3, 3.3.4 No Attachment

General Description: Quality System For Qualification For The National Board "R" Certificate

**Subgroup:** Repairs and Alterations

Task Group: Paul Shanks (PM), N. Carter, J. Walker, T. McBee

**Explanation of Need:** Threaded insert are being used to fix a bolt that has broken off on certain types of boilers (autoclaves) which hold the heating elements in the water side of the boiler. When this happens, the technician correcting the problem will simply drill out the broken bolt with an over sized bit and inset a metallic insert. NBIC does address this this type of alteration.

January 2020 Meeting Action: Mr. P. Shanks presented a Progress Report.

Item Number: 19-68 NBIC Location: Part 3, 1.6 No Attachment

General Description: Quality System For Qualification For The National Board "R" Certificate

**Subgroup:** Repairs and Alterations **Task Group:** None assigned.

**Explanation of Need:** Review of 1.6 for possible requirement for ANI's and ANII's to hold the (R)

Endorsement for "NR" activities.

**January 2020 Meeting Action:** Mr. P. Edwards presented a Progress Report.

Item Number: 19-82 NBIC Location: Part 3, 1.5.1 j) Attachment Page 24

**General Description:** Review verbiage in Part 3, 5.12.5.1 8) and 5.12.5.1.11)

**Subgroup:** Repairs and Alterations

Task Group: M. Quisenberry (PM).

**Explanation of Need:** Safety is not addressed in Part 3. This verbiage could be added to the 1.5.1 j) Method of Performing Work paragraph so Certificate Holders can address the safety concerns specific to their scope of activities.

**January 2020 Meeting Action:** Mr. M. Quisenberry was selected as the PM and presented this as a Progress Report.

#### **New Items:**

Item Number: 20-6 NBIC Location: Part 3, Table 2.3 Attachment Pages 25-31

General Description: Table 2.3 SWPS - Previous Versions accepted

**Subgroup:** Repairs and Alterations

Task Group: J. Sekely (PM)

**Explanation of Need:** The use of previous versions of the Designated SWPS is permitted. Previous versions include those reaffirmed, revised, or amended SWPSs regardless of publication date. The AWS reaffirms, amends or revises SWPSs in accordance with ANSI procedures. This Code addition will simplify the maintenance of Table 2.3.

**Update:** This item is currently being balloted to SC R&A for approval, and to Main Committee for Review and Comment.

Item Number: 20-7 NBIC Location: Part 3, 3.3.2 a) Attachment Page 32

**General Description:** Routine repairs of Div.2 & or Div.3 vessels

**Subgroup:** Repairs and Alterations

**Task Group:** N. Carter (PM)

**Explanation of Need:** An interpretation is scheduled to be issued under item number 19-26 asserting that Routine repairs are not to be used on Div.2 or Div.3 vessels. rather than require review of an interpretation which may expire in two years the body of the code should make it clear that Routine repairs are not compatible with div.2 or div.3 vessels.

Item Number: 20-8 NBIC Location: Part 3, 8.1 b) No Attachment

General Description: Interpretation revision process

**Subgroup:** Repairs and Alterations

Task Group: K. Moore (PM)

Explanation of Need: Adding language to specify that interpretations of previous NBIC editions are

applicable to the most current edition, as long as code requirements have not changed.

Item Number: 20-9 NBIC Location: Part 3, 9.1 Attachment Page 33

**General Description:** Define "Verify" in the NBIC Glossary

**Subgroup:** Repairs and Alterations

Task Group: N. Carter (PM)

**Explanation of Need:** Defining "Verify" in the NBIC Part 1, 2, 3, and 4 to align with the definition in

NB-263, RCI-1, Rules for Commissioned Inspectors.

Item Number: 20-10 NBIC Location: Part 3, New No Attachment Supplement

General Description: Develop a new Supplement to address rules and roles for FFS

**Subgroup:** Repairs and Alterations

Task Group: J. Siefert (PM)

**Explanation of Need:** Currently, the NBIC 3.3.4.8 provides for fitness for service for defects left in a pressure retaining item. It is proposed to develop a new Supplement to provide guidance in how to conduct FFS and roles and responsibilities unique to Part 3 concerning defects.

The current FFS form resides in Part 2 and can deal with in-service condition assessment and is loosely tied to defects in Part 3.

Item Number: 20-15 NBIC Location: Part 3, 3.3.2 & Attachment Page 34 5.7.2

General Description: Stamping requirements for routine repairs

**Subgroup:** Repairs and Alterations

Task Group: R. Troutt (PM), K. Moore

**Explanation of Need:** This would offer traceability to the R-Stamp holder responsible for the work.

Item Number: 20-16 NBIC Location: Part 3, 3.4.4 Attachment Pages 35-36

General Description: Rules to address re-cold stretching of vessels built to Appendix 44 rules

**Subgroup:** Repairs and Alterations

**Task Group:** None assigned.

**Explanation of Need:** ASME Section VIII Div.1 Mandatory Appendix 44 paragraph 44-6.2(g) clearly sets out that a vessel built to those rules needs to be re-stretch having had repair welding. it is not clear if ASME are referring to in process (at the original manufactures location) repairs or post construction repairs. However as the NBIC is currently silent this potential issue should be addressed.

Item Number: 20-20 NBIC Location: Part 3, 3.2.2 e) Attachment Page 37

**General Description:** Revision to Part 3, 3.2.2 e)

**Subgroup:** Repairs and Alterations

**Task Group:** None assigned.

**Explanation of Need:** The certificate holder should not have to explain or justify why a part was not pressure tested in the manufacturing stage. PG-106.8 of Section I allows the part to be fabricated and shipped as such therefore no explanation should be required.

Item Number: 20-28 NBIC Location: Part 3, 2.2.1 Attachment Page 38

General Description: Qualification of welding procedures by multiple organizations.

**Subgroup:** Repairs and Alterations

Task Group: None assigned.

**Explanation of Need:** The attached Section IX proposal has been approved for publication by the ASME board. While Section IX provides basis for these tests, it also requires that the ruling Code of Construction expressly permits this activity.

#### 11. Future Meetings

#### 12. Adjournment

Respectfully submitted,

Jonathan Ellis

Jonathan Ellis NBIC Secretary

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## ■ Subgroup Repairs/Alterations

Last Name	First Name	Interest Category	Role	Exp. Date	More
Boseo	Brian	National Board Certificate Holders	Chair	07/30/2020	<u>Details</u>
Schaefer	Benjamin	National Board Certificate Holders	Vice Chair	07/30/2020	<u>Details</u>
Hellman	Terrence		Secretary	12/30/2099	<u>Details</u>
Carter	Nathan	Authorized Inspection Agencies	Member	08/30/2021	<u>Details</u>
Hopkins	Craig	National Board Certificate Holders	Member	01/30/2023	<u>Details</u>
Johnson	Frank	Users	Member	01/30/2021	<u>Details</u>
McBee	Timothy	Authorized Inspection Agencies	Member	10/30/2022	<u>Details</u>
Miletti	Ray	Manufacturers	Member	08/30/2021	<u>Details</u>
Moore	Kathy	National Board Certificate Holders	Member	01/30/2021	<u>Details</u>
Morelock	Brian	Users	Member	01/30/2021	<u>Details</u>
Quisenberry	Michael	National Board Certificate Holders	Member	08/30/2021	<u>Details</u>
Sekely	James	General Interest	Member	08/30/2021	<u>Details</u>
Shanks	Paul	Authorized Inspection Agencies	Member	10/30/2022	<u>Details</u>
Siefert	John	General Interest	Member	08/30/2021	<u>Details</u>
Sperko	Walter	General Interest	Member	01/30/2023	<u>Details</u>
Sturm	Rick	Jurisdictional Authorities	Member	01/30/2023	<u>Details</u>
Toth	Marty	General Interest	Member	01/30/2023	<u>Details</u>
Troutt	Robby	Jurisdictional Authorities	Member	08/30/2020	<u>Details</u>
Underwood	Robert	Authorized Inspection Agencies	Member	10/30/2022	<u>Details</u>
Valdez	Rick	Manufacturers	Member	08/30/2020	<u>Details</u>
Walker	Jamie	National Board Certificate Holders	Member	08/30/2021	<u>Details</u>
White	Tom	Users	Member	01/30/2021	<u>Details</u>

#### TREVOR S. SEIME

825 Crescent Lane, Bismarck, ND 58501 (701) 220-4723

#### **Summary of Qualifications**

- Obtained National Board Joint Review Team Leader commission.
- Obtained **Asbestos Inspector** certification.
- Over 5 years experience as Chief Boiler Inspector for the State of North Dakota.
- Over 8 years experience as **Deputy Boiler Inspector** for the **State of North Dakota**.
- Over 7 years experience in **production management** including inventory management and procurement, quality assurance program management, and direct personnel supervision.
- Commissioned as an **Authorized Inspector** by the National Board of Boiler and Pressure Vessel Inspectors.
- Over 8 years experience in all aspects of **quality assurance** and machinery maintenance; **technical supervision**, **training**, and team problem solving associated with nuclear power reactors, steam plants, and all related auxiliary equipment.
- Proficient with IBM compatible computers including the use of Microsoft Office and related software.

#### **Work Experience**

State of North Dakota	Chief Boiler Inspector	2015-Present
State of North Dakota	Deputy Boiler Inspector	2006-2015
Creative Industries Inc.	Production Manager	1999-2006
Hartford Steam Boiler I & I Co. of CT	Authorized Inspector	1996-1999
Unites States Navy	Senior Machinery Inspector/Instructor/	1988-1996
	Repair Technician/Supervisor	

#### **Chief Boiler Inspector**

- Responsible for the administration and supervision of the program for the inspection of boilers and equipment for **safe operation and installation** in the State of North Dakota.
- Jurisdictional member of the National Board of Boilers and Pressure Vessel Inspectors.
- Maintained **National Board** commission with "A" & "IS" endorsements through continuing education courses.
- Have performed multiple joint reviews for repair shops to help insure compliance to the **National Board Inspection Code** and their quality control programs.

#### **Deputy Boiler Inspector**

- Responsible for inspection of boilers and equipment for **safe operation and installation** in the State of North Dakota.
- Witnessed and accepted **repairs** to all types of boilers within the state.

#### **Production Management**

- Directly responsible for **overall supervision** of production personnel/assembly line.
- Responsible for **procurement**, **receipt inspection**, **and management** of all inventory items.
- Developed time schedule for **timely completion** of production to meet required deadlines.

#### **Authorized Inspector**

- Possess a National Board of Boilers and Pressure Vessel Inspectors commission.
- Responsible for inspections in accordance with the American Society of Mechanical Engineers Boiler

#### and Pressure Vessel Code.

- Actively performed inspections within the regulations of the **National Board Inspection Code**.
- Directly involved in administering/upgrading the Quality Control systems for multiple shops/repair facilities.

#### **Quality Assurance Inspector/Supervisor**

- Administered the Navy's Quality Assurance program utilizing ISO 9000 requirements.
- Responsible for the **procurement**, **receipt in-check inspection**, **in-process control**, **and final acceptance** of repair parts for plant components.
- Knowledgeable in quality assurance; offering solutions to complex maintenance issues combining an in-depth knowledge of quality assurance with an overall understanding of all mechanical systems.

#### Supervisor/Operator

- **Expertly managed division** while direct supervisor was absent and provided forceful backup when supervisor was present.
- Excellent **steam plant operator** with a rapid qualification policy which provided for enhanced flexibility of man-hours and work schedule.
- Proven **flexibility** of hours that ensured **completion** of work and team goals.
- **Technical** proficiency and a sound **understanding** of power plant operation, making for an excellent team supervisor/member.
- **Created** work teams and **devised** creative plans to coordinate work to efficiently complete maintenance items despite a very restrictive schedule.

#### Instructor

- Responsible for the **training and certification** of officer and enlisted nuclear power plant operators in the areas of: Theoretical Concepts, Physics, Heat Transfer and Fluid Dynamics, Thermodynamics, and hands-on operation and emergency control.
- Provided **guidance** to newly reported personnel, treating them fairly and with dignity, instructing them on plant operation, and helping to ease their transition to submarine life and realize their importance to the division and to the entire team.

#### **Maintenance Technician**

- Obtained qualification as an **EPA** air conditioning and refrigeration universal technician.
- Displayed **superior** technical expertise and projected knowledge of plant maintenance to trainees.
- Provided an endless resource of **technical ability/knowledge** to division.

#### **Training**

National Board Joint Review Team Leader	32 Hours
Asbestos Inspector Course	24 Hours
Hartford Steam Boiler National Board Preparatory Course	120 Hours
Hartford Steam Boiler "A" Endorsement Course	40 Hours
Quality Assurance Inspector	40 Hours
Administration and Operation of Maintenance Systems	40 Hours
EPA Refrigeration and Air Conditioning Technician	40 Hours
Machine Tool Operator	120 Hours
Naval Nuclear Power Plant Operator	26 Weeks
Naval Nuclear Power School	24 Weeks
Naval Machinist's Mate "A" School	13 Weeks

# Interpretation IN19-26

# **Proposed Interpretation**

Inquiry:	IN19-26
Source:	Doug Biggar
Subject:	NBIC Part 3 Section Part 3, 3.3.2
Edition:	[Current/all]
General	Repair of none pressure boundary parts
Description:	
Question 1:	If a welding repair is done to an appendage of a horizontal ASME
	LPG pressure vessel such as a faulty leg or the raised data plate
	holder, is this considered routine and are we exempt to have an
	inspector present to witness it and/or fill out a specialized form?
Reply 1:	No inspector needs to be present as the welding is not performed
	on any part of the pressure vessel directly related to its
	performance under pressure.
Question 2:	What is the minimum length of an appendage we can weld onto without being an ASME/NBIC certified welder (only a standard welding ticket)?
Reply 2:	1/4"
Committee's	Are refurbishment activities such as shot blasting, thread
Question 1:	cleaning and painting considered within the scope of the NBIC?
Committee's Reply 1:	No
Rationale 1:	These activities should not affect the pressure retaining integrity
	of the item, per the introduction to the NBIC that (maintenance) is
	the function of the NBIC. Reasonably these activities fall outside
	the scope of the NBIC
	· ·
Committee's	Do welding activities on items which have neither a pressure
Question 2:	retaining or load bearing function fall within the scope of the NBIC
Committee's Reply 2:	No.
Rationale:2	These welds are such that typical ASME BPV construction codes would not dictate the qualification of the welders or welding operators.
NBIC Vote	

#### Include in response letter: NA

#### Rationale:

Having emailed the enquirer to determine the scope of their typical operations it was clear that there was a general misunderstanding about the purpose of the NBIC, the proposed questions are overly specific and as sure fail to grasp the crux of the issue hence the question re-write. Q3 was added to ensure that no misunderstand occurs. With the exception of a very hardline reading on Section 3.3.2 a) the NBIC addresses in the main body and the introduction the pressure retaining capability of the item and not work conducted elsewhere.

Sections 3.3.2 e), 3.3.3 & 3.4.4 address working (welding / replacing) on components which have a pressure retaining function. Pipes, tubes, heads, shell, and tube sheet are mentioned, integral parts without pressure retaining function such as legs and davit arms are not addressed.

Section 3.3.3 a) can be read as "Weld repairs or replacement of pressure parts or of (sic) attachments that have failed in a weld or in the base material;"

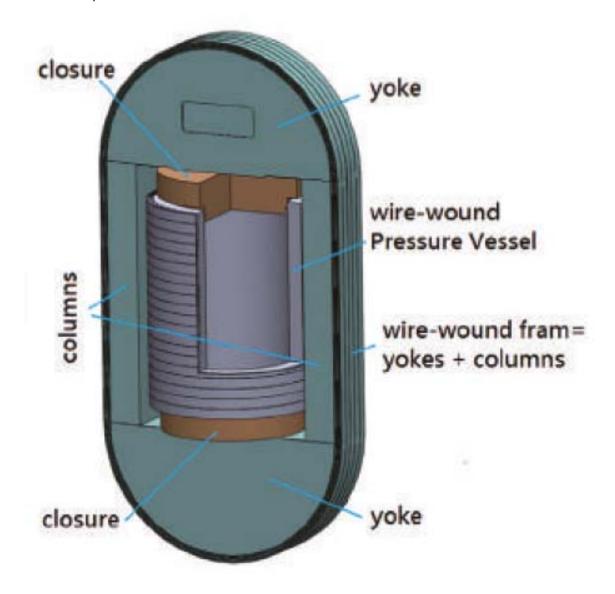
Inquiry No.	20-3
	Nathan Carter, HSB
Source	nathan_carter@hsb.org
Subject	Inspector involvement in Fitness-for-Service Assessments
	Background:
	The below questions are intended to gain clarity as to first which Inspector (i.e. "IS" Commissioned or "R" Endorsement) signs the FFSA Form NB-403 when an "R" Certificate Holder is involved with a repair in that region as well as determine what level of review of the Fitness-for-Service the Inspector is expected to complete. If it is an Inspector holding a "R" Endorsement with an AI Commission (not tested on NBIC Part 2), shouldn't the relevant pages in NBIC Part 2 concerning Fitness for Service be included in their tested body of knowledge, so they are aware of the detailed rules?
	The Body-Of-Knowledge for National Board Inspectors holding either an "IS" Commission or "R" Endorsement does not reference ASME FFS-1/API 579 Fitness-For-Service Standard or have any expectation that the Inspector be capable of determining if the correct Fitness for Service methodology was used or that the assumptions taken by the Engineer in the analysis were the most appropriate or accurate. Clarification is also requested due to the Form NB-403 signature block stating "Verified by" for the Inspector without any other disclaimers as typically found on other Forms signed by Inspectors such as ASME MDRs and NBIC Form R-1/R-2.
	An example is a R-Certificate holder was hired to repair a weld seam. It was discovered during a repair that multiple base metal laminations existed adjacent to the repair location. A Fitness for Services Evaluation was subsequently performed. The first question is whether or not it is the responsibility of the Repair Inspector to sign the FFSA form once everything has been properly vetted, since the defect being left in place is not necessarily within the scope of the initial repair being performed by the "R" Certificate Holder, or should this be signed off by a Commissioned Inservice Inspector, since they are examined on the rules of NBIC Part 2? Also, Form NB-403 is vague in the signature block region for the scope of what the Inspector is signed for. It could be alluded that without a statement, such as those found on the R-1 and R-2 forms, the Inspector is signing off on the appropriateness and adequacy of the Fitness-For-Service methodology performed by the Engineer.
Edition	2019; Part: Repairs and Alterations; Section: 3; Paragraph: 3.3.4.8 2019; Part: Inspection; Section: 4; Paragraph: 4.4
Question	Question 1: In accordance with NBIC Part 3, 3.3.4.8, a fitness-for-service condition assessment as described in NBIC Part 2, 4.4 shall be completed and adequately documented on the FFSA Form NB-403. Once Form NB-403 is completed, is it required that the Inspector signing this Form hold a National Board "R" Endorsement as described in RCI-1/NB-263?
	Question 2: NBIC Part 2 4.4.1 d) states that the Inspector shall indicate acceptance of the Report of FFSA by signing. Paragraph 4.4.3 b) states that the Inspector shall review the condition assessment methodology and ensure that the inspection data and documentation are in accordance with Part 2. Is the Inspector's signature on Form NB-403 an indication that the condition assessment and recommendations completed by the Engineer have been fully reviewed for appropriateness and accuracy by the Inspector?

	Question 3: If the answer to Question 2 is No, is the Inspector's signature on Form NB-403 an indication of acceptance solely on the basis of review of the Form for completeness and verification that the requirements outlined in 4.4 were addressed?
Reply	Proposed Reply 1: Yes Proposed Reply 2: No
	Proposed Reply 3: Yes
Committee's Question	
Committee's Reply	
Rationale	

Inquiry No.	20-11
	Hugh-Jean Nel, Sasol
Source	Hugh-Jean.Nel@sasol.com
	Scope of Repairs
Subject	
	<b>Background:</b> Historically NBIC has not defined limitations on the scope of repair provided the entire item is being rebuilt, see Question & Reply 2 & 3 in Interpretation 98-28. NBIC Part 3 lists several examples of repair but nowhere limits the scope or amount of these examples that can be utilized when performing repairs. This creates some uncertainty when performing some types of repairs, such as replacing the tubesheets of a fixed tubesheet type heat exchanger as listed in 3.3.3 e). According to ASME BPV Code Section VIII Division 1 Part UHX, Section 13, the length of the tubes is a design parameter and therefore replacing the tubesheet in accordance with its original design might require the replacement of the tubes as well to maintain the original design length.
Edition	2019; Part: Repairs and Alterations; Section: 3; Paragraph: 3.3.3 Examples of Repairs
Question	Question: Is it permissible for repair activities performed on pressure retaining equipment to have more than one activity listed in 3.3.3 with the scope of repair?
Reply	Proposed Reply: Yes, provided that the scope of repairs has been approved by the Inspector, and when required, by the Jurisdiction.
Committee's Question	
Committee's Reply	
Rationale	

Proposed inquiry to NBIC from Monte Bost (monte\_bost@hsb.com)

Background: A Section VIII, Division 3 pressure vessel is made from machined forgings with no welding. The pressure retaining items are a cylinder, end closures and a frame that holds the end closures in place. A sketch is provided.



#### Inquiry

Subject: National Board Inspection Code 2019 Edition, Part 3, 3.3.3 and 5.12.4.1

Question 1: A Section VIII, Division 3 pressure vessel is made without welding from machined forgings. The pressure retaining components consist of a cylinder, end closures and a frame that holds the end closures in place. If one of the pressure retaining components is replaced with a new ASME-stamped "Part", is this activity considered a repair?

Proposed Reply (1): Yes.

Question 2: For the repair described in Question (1) above, how shall Line 7, "REPAIR TYPE" be indicated on the Form R-1, *Report of Repair*?

Proposed Reply (2): Indicate "Type of Repair: Mechanical" in Line 10 "Remarks".

Inquiry No.	20-17
	Roy Darby, Chevron Products Company
Source	roy.darby@chevron.com
	Weld build of wasted areas with different material
Subject	<b>Background:</b> It is common practice to weld build the wasted area of a component with original material and then to overlap with a corrosion resistant material to prevent future wasting of the component. It would be more efficient to simply restore the wasted area with the corrosion resistant material, provided that it meets or exceeds the strength requirements of the original material. This represents cost savings for industry with no expected downside.
Edition	2019; Part: Repairs and Alterations; Section: 3; Paragraph: 3.3.3 Examples of Repairs
Question	Question: Would it be acceptable as a repair to weld build wasted areas with a material of different nominal composition and, equal to or greater in ultimate stress from that used in the original design, provided the replacement material satisfies the material and design requirements of the original code of construction under which the vessel was built? The minimum required thickness would be at least equal to the thickness stated on the original Manufacturer's Data Report.
	This would be an amalgamation of 3.3.3 (c),(d), and (r) into a single activity.
Reply	Proposed Reply: Yes.
Committee's Question	
Committee's Reply	
Rationale	

Inquiry No.	20-21
	Eric Feeney, TEI Construction Services
Source	efeeney@teiservices.com
	Nondestructive Examination
Subject	<b>Background:</b> When a boiler outage is being performed, there may be 50-10,000+ welds made. We are accustomed to performing 100% volumetric examination when a hydrostatic test is not being performed.  Some of our inspectors suggest that we can perform a portion of the NDE as volumetric and the remainder as VT.  When I read 4.4.1 e) it seems to have validity, but I generally have understood paragraph e) to have been referring to each individual weld and not the repair as a whole. This is what I would like clarification on.
Edition	2019; Part: Repairs and Alterations; Section: 4; Paragraph: 4.4.1 e)
Question	Question: May a portion of a repair be subject to NDE other than visual, and the remainder of the repair be subject to exclusive use of VT in accordance with Part 3, 4.4.1 e)?
Reply	Proposed Reply: Yes.
Committee's Question	
Committee's Reply	
Rationale	

Inquiry No.	20-23
	Paul Shanks, OneCIS
Source	Paul.shanks@onecis.com
Subject	Alteration of ASME Section VIII Div.2 vessels
	Background: Many Div.2 vessels which are in need of repair are of sufficient age whereby all of the original paperwork was paper work. Even with the best efforts such documents can become damaged or lost by the flooding event associated with the gulf coast hurricane events and or the types of refinery fires that are all too common. In a good deal of cases these vessels simply need a new B-16.5 weld neck flange or a gasket surface weld metal build up in order to allow continued leak free surface but due to some documents being unavailable the owner is left to choose between making no repair or making a repair which is not compatible with the NBIC.  Explanation of Need: 3.3.5.2 & 3.4.5.1 both require that a repair or alteration for div.2
	vessels are checked for compatibility with the original UDS which is clearly best practice for these higher stressed vessels, however a great deal of work needed on these vessels no doubt due to the higher level of engineering examination during initial fabrication is limited to fixing the problems that come form leaking gaskets i.e. corrosion on gasket faces which may require weld metal build up less than 20"2 or replacement of an ASME standard flange like for like. The professional engineer whom must review and sign for repair plans is qualified to review the service history and/or whatever original documentation is available and determine if a simple flange replacement or weld metal build up is acceptable or not.
Edition	2019 NBIC, Part 3, 3.4.5.1 b)
Question	Question: Given that Paragraph 3.4.5.1 b) allows for the User Design Specification (UDS) to be revised in the case where a proposed alteration is not compatible with the existing UDS is it unacceptable in cases where the original UDS is not available to generate a new UDS which is compatible with the design load case included with the original Manufactures Design Report?
Reply	Proposed Reply: No.
Committee's Question	
Committee's Reply	
Rationale	

Inquiry No.	20-24
	Paul Shanks, OneCIS
Source	Paul.shanks@onecis.com
	Certification of repair or alteration plans
Subject	
	<b>Background:</b> 3.4.5.1 b) allows for the UDS to be revised if a proposed alteration plan is not compatible with the original. this revised UDS must be certified by an engineer as must the Alteration plan, there currently does not appear to be a separation of the two certifying activity's which is not in the spirit of Div.2 requiring different engineers for the UDS and MDR.
	2019 NBIC, Part 3, 3.4.5.1 b)
Edition	
Question	Question: Is it acceptable for the Repair/alteration plan to be certified by one of the same engineers that certified the UDS, Revised UDS or MDR?
Reply	Proposed Reply: No.
Committee's Question	
Committee's Reply	
Rationale	

Inquiry No.	20-29				
Common	Craig Bierl, Chubb Limited craig.bierl@chubb.com				
Source	PV Cycles of operations change as an alteration				
Subject	Background: Isostatic Presses in particular (but found in other pressure vessels also) are restricted by the data report to a finite number of cycles. Operators of these vessels routinely use curves to modify what is considered a cycle and extend the life of the vessel. These vessels represent a substantial risk of failure and this practice is very difficult for the inservice inspector to successfully track and audit to ensure the integrity of these vessels are maintained as this is a grey area in the current code as written.  This is the real life scenario that has appeared on 7 of these vessels in the last 6 months (that is every one that I have been involved in evaluating for insurance coverage).  1. ASME data report says X cycles. Normally around 15-25,000.  2. Vessel is 20+ years old  3. You ask about operation and the vessel operates 330 days per year and has 5 operating cycles per day (some are 2 some are more, just throwing a number up to illustrate). So, simple math says 330x5=1650 cycles per year 25,000/1650=15.15 years of life  4. You ask for records of the operation  a. You are presented with a degraded cycle curve  b. "we don't operate at maximum temp (and/or) pressure" so we aren't taking a full cycle  c. So now the same vessel shows that it only has 650 cycles on it or 1200 (instead of 30,000)  5. Their argument is that they are below the "design cycles", well there is no rational that the inspector can adequately track the design cycles to a degree of comfort.  a. I attached one of the better design cycle tracking mechanism's I have seen, however it is still lacking  Bottom line, the "operational cycle" is easily trackable. The use of curves to increase the operational cycle count beyond the ASME data report cycle maximum appears to be in conflict and lacks standardization, which makes it difficult to audit and ensure uniform measures are being taken. The cycle count appears on the data report as a criteria, if that criteria is intended to limit the operational cycle, than the use of a curve to				
Edition	2019 NBIC, Part 3, 3.4.4 2019 NBIC, Part 2, 2.3.6.8 & 2.3.6.10				
Question	Question: Should the use of a curve to extend the number of operating cycles beyond the number of cycles indicated on the ASME data report be considered an alteration/re rating of a pressure vessel (ASME Section 8 Part 3)?				

Reply	Proposed Reply: Yes. The use of a curve to extend the number of operating cycles is a change in the material data on the ASME data report and is therefore an alteration of the vessel and should be considered as such through a formal re-rating process.
Committee's Question	
Committee's Reply	
Rationale	

Item #: NB15-1405

Revision: 1

**Date:** January 14, 2020

Subject: Clarification of Impact Testing Rules for Repairs

#### Justification:

This revision was generated to address an interpretation asking whether production impact test plates were required for repair of vessels made from P-No 11B materials, when no extra material from one of the heats exist. Where extra material does not exist from one of the heats, the original code of construction would require existing material from the vessel to be used. This would require the vessel to be further damaged with material being cut out to serve as a test plate.

Initially this interpretation was meant to address only P-No 11B material; however, this same problem exists for all vessel materials. As a result, the following proposal was generated.

### **INSERT NEW PARAGRAPHS:**

#### 3.3.6 Pressure Vessel Impact Testing

- 3.3.6.1 Welding procedures used for repairs shall be qualified with impact testing when required by the original code of construction. The requirements for impact testing shall be in accordance with the rules of the original code of construction.
- 3.3.6.2 When the original code of construction requires the welding and testing of production impact test plates, the welding of production impact test plates shall be in accordance with the rules of the original code of construction. The production impact test plates shall be from the material in the vessel. When this is not practicable, the material may be from the same P-No and Group Number as the material being repaired.
- 3.3.6.3 The test material for the welding procedure qualification and for the production impact test plate shall be of the same material specification (including specification type, grade, class, and condition of heat treatment) as the material being repaired. In the event that the notch toughness of the material to be repaired is unknown, evidence from tests of that material or from another acceptable source (see NBIC Part 3, 2.5.3) may be

used for the base metal notch toughness when qualifying the WPS as required in NBIC Part 3, 2.5.3.2 h).

In the event that the original material specification is obsolete, the test material used should conform as closely as possible to the original material used for construction based on nominal composition and carbon equivalent (IIW Formula CE = C + Mn/6 + (Cr + Mo + V)/5 + (Ni + Cu)/15; elements are expressed in Weight Percent Amounts), but in no case shall the material be lower in strength.

## **Background for Interpretation 18-100**

## **Task Group PM – David Martinez**;

Task Group members: Marty Russel and Nathan Carter

Item Number: 18-100 NBIC Location: Part 3, 3.3.2 Attachment Page 44

**General Description:** Revision adding (plugging) heat exchanger tubes with an outside diameter of ¾" or smaller to NBIC Part 3.3.2 Routine Repairs

Subgroup: Repairs and Alterations

**Task Group:** David Martinez (PM)

**January 2019 Meeting Action:** Progress Report: Mr. Martinez reported on this item and presented interpretations (98-04 and 98-29) that may satisfy the revision request, however after a presentation from TEiC regarding the use of explosive welding of tubes to be considered as a routine repair, Mr. Martinez recommend this be considered progress report to continue working to address explosive welding as a Routine Repair.

#### **3.3.2 ROUTINE REPAIRS**

- a) Routine repairs are repairs for which the requirements for in-process involvement by the Inspector and stamping by the "R" Certificate Holder may be waived as determined appropriate by the Jurisdiction and the Inspector. All other applicable requirements of this code shall be met. Prior to performing routine repairs, the "R" Certificate Holder should determine that routine repairs are acceptable to the Jurisdiction where the pressure-retaining item is installed;
- b) The Inspector, with the knowledge and understanding of jurisdictional requirements, shall be responsible for meeting jurisdictional requirements and the requirements of this code;
- c) The "R" Certificate Holder's Quality System Program shall describe the process for identifying, controlling, and implementing routine repairs. Routine repairs shall be documented on Form R-1 with this statement in the Remarks section: "Routine Repair";
- d) Alternative welding methods without postweld heat treatment as described in NBIC Part 3, 2.5.3 shall not be used for routine repairs.

#### (Example of proposed additional category to examples of Routine Repairs – paragraph e)

- e) The following repairs may be considered as routine repairs and shall be limited to these categories:
  - 1) Welded repairs or replacements of valves, fittings, tubes, or pipes NPS 5 (DN 125) in diameter and smaller, or sections thereof, where neither postweld heat treatment nor

NDE other than visual is required by the original code of construction. This includes their attachments such as clips, lugs, skirts, etc., but does not include nozzles to pressure-retaining items;

- 2) The addition or repair of nonload bearing attachments to pressure-retaining items where postweld heat treatment is not required;
- 3) Weld buildup of wasted areas in heads, shells, flanges and fittings not exceeding an area of 100 in.2 (64,520 mm2) or a thickness of 25% of nominal wall thickness or 1/2 in. (13 mm), whichever is less;
- 4) Corrosion resistance weld overlay not exceeding 100 in.2 (64,520 mm2); and
- 5) Seal welding a mechanical connection for leak tightness where by-design, the pressure retaining capability is not dependent on the weld for strength and requires no postweld heat treatment; and

6) Plugging of heat exchanger tubes ¾ in. outside diameter and smaller when explosive plugging is used as method of plugging tubes.

### **Background Interpretation**

#### **INTERPRETATION 15-04**

Subject: Part 3, Section 3

Edition: 2015

Question: Is explosion welding of plugs into leaking heat exchanger tubes considered a repair

per the NBIC Part 3?

**Reply:** Yes.

# **Support for Consideration of the Proposed Action**

<u>ASME Section IX – 2019 (Addresses Procedure and Performance Qualification for Explosion Welding heat exchanger tubes to tubesheets, but not the plug to the tube</u>)

#### **QW-193 TUBE-TO-TUBESHEET TESTS**

When the applicable Code Section requires the use of this paragraph for tube-to-tubesheet demonstration mockup qualification, QW-193.1 through QW-193.1.3 shall apply.

**QW-193.1** Procedure Qualification Specimens. Ten mockup welds are required for qualifying each tube-to tubesheet welding procedure. The mockup assembly shall essentially duplicate the tube-to-tubesheet weld joint design to be used in production, within the limits of the essential variables of QW-288. The mockup test assembly shall be prepared with the tubesheet element having a thickness not less than the lesser of the thickness of the production tubesheet or 2 in. (50 mm). For tube-to-tubesheet welds to clad tubesheets, the cladding or overlay may be represented by a base material with a chemical composition that is essentially equivalent to the cladding composition. All welds in the mockup assembly shall be subjected to the following tests and shall meet the applicable acceptance criteria.

**QW-193.1.1 Visual Examination.** The accessible surfaces of the welds shall be examined visually with no magnification required. The welds shall show complete fusion, be free from visual cracks or porosity indications, and have no evidence of burning through the tube wall.

**QW-193.1.2 Liquid Penetrant.** The liquid penetrant examination shall meet the requirements of Section V, Article 6. The weld surfaces shall meet the requirements of QW-195.2.

**QW-193.1.3 Macro-Examination.** The mockup welds shall be sectioned through the center of the tube for macro-examination. The four exposed surfaces shall be smoothed and etched with a suitable etchant (see QW-470) to give a clear definition of the weld and heat-affected zone. Using a magnification of 10X to 20X, the exposed cross sections of the weld shall confirm (a) minimum leak path dimension required by the design

- (b) no cracking
- (c) complete fusion of the weld deposit into the tubesheet and tube wall face

Qualification	of Tu	be-t	s for Procedure o-Tubesheet Welding Welding)
Paragraph		Brief of Variables	
QW-403 Base Metals	.35	φ	Tube thickness
QW-410	.82	φ	Pressure application
Technique	.83	φ	Explosive
	.84	φ	Distance charge to tubesheet
	.85	φ	Specified clearance

**QW-410.83** A change in the type of explosive or a change in the energy content greater than ±10%.

**QW-410.84** A change in the distance between the explosive charge and the tubesheet face greater than  $\pm 10\%$ .

**QW-410.85** A change in the specified clearance between the tube and the tubesheet greater than ±10%.

#### QW-193.2 Performance Qualification Specimens.

A minimum of five mockup tube-to-tubesheet welds are required to qualify each welder or welding operator. The same rules as those applicable for procedure qualification (QW-193.1) shall be followed, with the following additional requirements and exceptions:

(a) The essential variables in QW-387 shall apply.

(b) Essential performance qualification variables applicable for each welding process listed in QW-350 or QW-360 shall also be observed in addition to the variables of Table QW-388. (c) Postweld heat treatment may be omitted.

Only one mockup weld is required to renew a welder's or welding operator's qualification when that qualification has expired or has been revoked per the requirements of QW-322.1.

#### Logic to consider motion for approval:

- Explosion welding to plug leaking tubes is supported by qualified written welding procedures and welder qualification procedures compared to other mechanical tube-plugging methods that are performed with no NBIC guidance.
- Explosion welding does not rely on fusion to join the two materials. It is a pressure weld in which the explosive force joins the two materials. Unlike fusion welding that is allowed in other examples of Routine Repairs, there is no heat affected zone, and PWHT is not needed nor required.
- The majority, if not all explosion tube plugging is performed on tubes ¾" and smaller, and typically under emergency conditions. No Inspector involvement would be required if this specific category was added to the categories of Routine Repairs
- The explosion tube-plugging method for tubes ¾" and smaller would be more cost and schedule effective and is proven to be a reliable method for plugging leaking heat exchanger tubes for owners and users.

Note: The only realistic test upon completion of explosion tube-plugging is a pressure test.

# Item 19-16: NBIC Part 3, 3.2.2 e) Submitted by: Eben Creaser <a href="mailto:eben.creaser@gnb.ca">eben.creaser@gnb.ca</a>

**Explanation of Need:** This wording of this clause is causing confusion. I have had multiple instances where owners have requested to purchase welded replacement parts directly and read this clause with the belief that they can purchase a replacement part for in some cases a welded pressure part for an ASME Section I boiler and safe money by having the fabricator not Hydro test as per Section I even when it was not impractical to have the testing performed.

**Background Information:** The second sentence of 3.2.2 seems to provide optional provisions that contradict the mandatory requirement stated in the first sentence that requires 3.2.2 c) or d) parts to be pressure tested by the original code of construction. If this is the intent of the committee then the clause should be reworded to add an "or" between the sentences. The wording could also be understood to mean that all parts addressed in 3.2.2 c) or d) have to be pressure tested. But then the second sentence alludes to an optional requirement, it's just not clear.

#### **Proposed Text:**

If the intent of this clause is to provide optional pressure test requirements for parts then;

e) Replacement parts addressed by 3.2.2 c) or d) above shall receive a pressure test as required by the original code of construction <u>prior to installation</u>, <u>or</u>, <u>when accepted by the owner</u>, <u>the Inspector and</u>, <u>where required</u>, <u>the Jurisdiction</u>, <u>parts</u>. <u>If replacement parts have not been pressure tested as required by the original code of construction prior to installation they may be installed without performing the original code of construction pressure test provided the owner, the Inspector and, when required, the Jurisdiction accept the use of one or a combination of the examination and test methods shown in Part 3, Section 4, paragraph 4.4.1 (for repairs) or 4.4.2 (for alterations). The R Certificate Holder responsible for completing the R Form shall note in the Remarks section of the R Form the examination(s) and test(s) performed, and the reason the replacement part was not tested in accordance with the original code of construction.</u>

# Item 19-82: Request for Revision to NBIC Part 3, 1.5.1 j)

Terrence Hellman National Board thellman@nationalboard.org 614-431-3234

Purpose	Safety is not addressed in Part 3. This verbiage could be added to the 1.5.1 j) Method of Performing Work paragraph so Certificate Holders can address the safety concerns specific to their scope of activities.
Scope:	Part: Repairs and Alterations; Section: 1.5.1; Paragraph: 1.5.1 j)
Background:	Safety concerns from confined space issues, to flammable or volatile vessel contents should be addressed in Part 3 to ensure that welders, Inspectors, and other personnel are not put at unnecessary risk during Repair/Alteration activity.
Proposed Revision:	See below for the proposed revision

# 1.5.1 OUTLINE OF REQUIREMENTS FOR A QUALITY SYSTEM FOR QUALIFICATION FOR THE NATIONAL BOARD "R" CERTIFICATE OF AUTHORIZATION

#### h) Repair and Alteration Methods

The manual shall include controls for repairs and alterations, including mechanical assembly procedures, materials, nondestructive examination methods, pre-heat, and postweld heat treatment, as applicable. Special requirements such as nonmetallic repairs and alterations to graphite and fiber- reinforced thermosetting plastic pressure-retaining items including bonding or mechanical assembly procedures shall be addressed, if applicable.

#### i) Materials

The manual shall describe the method used to ensure that only acceptable materials (including welding material) are used for repairs and alterations. The manual shall include a description of how existing material is identified and new material is ordered, verified, and identified. The manual shall identify the title of the individual(s) responsible for each function and a brief description of how the function is to be performed.

#### j) Method of Performing Work

The manual shall describe the methods for performing and documenting repairs and alterations in sufficient detail to permit the Inspector to determine at what stages specific inspections are to be performed. The method of repair or alteration must have prior acceptance of the Inspector. The manual shall include provisions to ensure safe working conditions during welding, testing, and all activities related to repairs or alterations.

#### k) Welding, NDE and Heat Treatment

The manual shall describe controls for welding, nondestructive examination (NDE), and heat treatment. The manual is to indicate the title of the individual(s) responsible for the welding procedure specification (WPS) and its qualification, and the qualification of welders and welding

#### 2.3 STANDARD WELDING PROCEDURE SPECIFICATIONS (SWPSs)

- a) One or more SWPSs from NBIC Part 3, Table 2.3 may be used as an alternative to one or more WPS documents qualified by the organization making the repair or alteration, provided the organization accepts by certification (contained therein) full responsibility for the application of the SWPS in conformance with the Application as stated in the SWPS. When using SWPSs, all variables listed on the Standard Welding Procedure are considered essential and, therefore, the repair organization cannot deviate, modify, amend, or revise any SWPS. US Customary Units or metric units may be used for all SWPSs in NBIC Part 3, Table 2.3, but one system shall be used for application of the entire SWPS in accordance with the metric conversation table contained in the SWPS. The user may issue supplementary instructions as allowed by the SWPS. Standard Welding Procedures Specifications shall not be used in the same product joint together with the other Standard Welding Procedure Specifications or other welding procedure specifications qualified by the organization. SWPSs may be purchased at the AWS Bookstore at http://pubs.aws.org.
- b) The AWS reaffirms, amends or revises SWPSs in accordance with ANSI procedures.
  - 1) Reaffirmed SWPSs: When reaffirmation occurs without revision to the SWPS, the letter R is added to the SWPS designation.
  - 2) Amended SWPSs: When an amendment occurs the suffix "AMD1" is added to the SWPS designation. Amendments are issued when essential for the prompt correction of an error that could be misleading. Amendments are incorporated into the existing text of the SWPS, which is reprinted and clearly marked as incorporating an amendment(s), and which is identified in the revised <a href="Foreword">Foreword</a> of the amended SWPS.
  - 3) Revised SWPSs: When a revision to a published SWPS occurs, the publication date is added to the SWPS designation. The date of the superseded SWPS is also noted on the cover page. Previous versions of the superseded SWPS may be used at the option of the R Certificate holder.
- c) The use of previous versions of the listed SWPSs is permitted. Previous versions include Reaffirmed, Amended, or Revised SWPSs regardless of the publication date

TABLE 2.3
CARBON STEEL- (P1/M1 MATERIAL)

SMAW — Shielded Metal Arc Welding	
TITLE	DESIGNATION: YEAR
Standard Welding Procedure Specification for Shielded Metal Arc Welding of Carbon Steel, (M-1/P-1, Group 1 or 2), 3/16 in. through 3/4 in., As- Welded Condition, With Backing, Primarily Plate and Structural Applications.	B2.1-1-001: 2018
Standard Welding Procedure Specification for Shielded Metal Arc Welding of Carbon Steel (M-1/P-1/S-1, Group 1 or 2), 1/8 in. through 1 ½ in. Thick, E7018, As-Welded or PWHT Condition, Primarily Plate and Structural Applications.	B2.1-1-016: 2018
Standard Welding Procedure Specification for Shielded Metal Arc Welding of Carbon Steel (M-1/P-1/S-1, Group 1 or 2), 1/8 in. through 1 ½ in. Thick, E6010, As-Welded or PWHT Condition, Primarily Plate and Structural Applications.	B2.1-1-017: 2018
Standard Welding Procedure Specification for Shielded Metal Arc Welding of Carbon Steel (M-1/P-1/S-1, Group 1 or 2), 1/8 in. through 1 ½ in. Thick, E6010 (Vertical Uphill) followed by E7018, As-Welded or PWHT Condition, Primarily Plate and Structural Applications.	B2.1-1-022: 2018
Standard Welding Procedure Specification for Shielded Metal Arc Welding of Carbon Steel (M-1/P-1/S-1, Group 1 or 2), 1/8 in. through 1 ½ in. Thick, E6010 (Vertical Downhill) followed by E7018, As-Welded or PWHT Condition, Primarily Plate and Structural Applications.	B2.1-1-026: 2018
Standard Welding Procedure Specification for Shielded Metal Arc Welding of Carbon Steel (M-1/P-1, Group 1 or 2), 1/8 in. (3mm) through 3/4 in. (19 mm) Thick, E6010 (Vertical Uphill) followed by E7018, (Vertical Uphill) in the As-Welded Condition, Primarily Pipe Applications.	B2.1-1-201: 2019
Standard Welding Procedure Specification for Shielded Metal Arc Welding of Carbon Steel (M-1/P-1, Group 1 or 2), 1/8 in. (3 mm) through 3/4 in. (19 mm) Thick, E6010 (Vertical Downhill) followed by E7018 (Vertical Uphill), in the As-Welded Condition, Primarily Pipe Applications.	B2.1-1-202: 2019
Standard Welding Procedure Specification for Shielded Metal Arc Welding of Carbon Steel (M-1/P-1, Group 1 or 2), 1/8 in. (3 mm) through 3/4 in. (19 mm) Thick, E6010 (Vertical Uphill), In the As-Welded Condition, Primarily Pipe Applications.	B2.1-1-203: 2019
Standard Welding Procedure Specification for Shielded Metal Arc Welding of Carbon Steel (M-1/P-1, Group 1 or 2), 1/8 in. (3 mm) through 3/4 in. (19 mm)Thick, E6010 (Vertical Downhill Root with balance Vertical Uphill), in the As-Welded Condition, Primarily Pipe Applications.	B2.1-1-204: 2019
Standard Welding Procedure Specification for Shielded Metal Arc Welding of Carbon Steel (M-1/P-1, Group 1 or 2), 1/8 in. (3 mm) through 1 ½ in. (38 mm) Thick, E6010 (Vertical Uphill) followed by E7018 (Vertical Uphill), in the As-Welded or PWHT Condition, Primarily Pipe Applications.	B2.1-1-205:2019
Standard Welding Procedure Specification for Shielded Metal Arc Welding of Carbon Steel (M-1/P-1, Group 1 or 2), 1/8 in. (3 mm) through 1-1/2 in. (38 mm) Thick, E6010 Vertical Downhill) followed by E7018 (Vertical Uphill), in the As-Welded or PWHT Condition, Primarily Pipe Applications.	B2.1-1-206:2019
Standard Welding Procedure Specification for Shielded Metal Arc Welding of Carbon Steel (M-1/P-1, Group 1 or 2), 1/8 in. (3 mm) through 1 ½ in. (38 mm) Thick, E7018, in the As-Welded or PWHT Condition, Primarily Pipe Applications.	B2.1-1-208: 2019

GTAW — Gas Tungsten Arc Welding	
TITLE	DESIGNATION: YEAR
Standard Welding Procedure Specification for Gas Tungsten Arc Welding of Carbon Steel, (M-1/P-1, Group 1 or 2), 3/16 in. through 7/8 in. Thick, in the As-Welded Condition, With or Without Backing, Primarily Plate and Structural Applications.	B2.1-1-002: 2006
Standard Welding Procedure Specification for Gas Tungsten Arc Welding of Carbon Steel (M-1/P-1, Group 1 or 2), 1/8 in. (3 mm) through 1 ½in. (38 mm) Thick, ER70S-2, As-Welded or PWHT Condition, Primarily Pipe Application.	B2.1-1-207: 2019
Standard Welding Procedure Specification for Gas Tungsten Arc Welding with Consumable Insert Root of Carbon Steel (M-1/P-1/S-1, Group 1 or 2), 1/8 in. through 1-1/2 in. Thick, INMs-1, ER70S-2, As-Welded or PWHT Condition, Primarily Pipe Applications.	B2.1-1-210: 2012

FCAW — Flux Core Arc Welding	
TITLE	DESIGNATION: YEAR
Standard Welding Procedure Specification for Self-Shielded Flux Cored Arc Welding of Carbon Steel (M-1/P-1/S-1, Group 1 or 2), 1/8 in. through 1 ½ in. Thick, E71T-8, As-Welded Condition, Primarily Plate and Structural Applications.	B2.1-1-018: 2005
Standard Welding Procedure Specification for CO2 Shielded Flux Cored Arc Welding of Carbon Steel (M-1/P-1/S-1, Group 1 or 2), 1/8 in. through 1 ½ in. Thick, E70T-1 and E71T-1, As-Welded Condition, Primarily Plate and Structural Applications.	B2.1-1-019: 2018
Standard Welding Procedure Specification for 75% Ar/25% CO2 Shielded Flux Cored Arc Welding of Carbon Steel (M-1/P-1/S-1, Group 1 or 2), 1/8 in. through 1-1/2 in. Thick, E70T-1M and E71T-1M, As-Welded or PWHT Condition, Primarily Plate and Structural Applications.	B2.1-1-020: 2018
Standard Welding Procedure for Self-Shielded Flux Cored Arc Welding of Carbon Steel (M-1/P-1 Group 1 or 2), 1/8 in. (3 mm) through 1/2 in. (13 mm) Thick, E71T-11, As-Welded Condition, Primarily Plate and Structural Applications.	B2.1-1-027: 2018
Standard Welding Procedure Specification (SWPS) for Argon Plus 25% Carbon Dioxide Shielded Flux Cored Arc Welding of Carbon Steel (M-1/P-1/S-1, Groups 1 and 2), 1/8 in. through 1 ½ in. Thick, E7XT-XM, As-Welded or PWHT Condition, Primarily Pipe Applications.	B2.1-1-234: 2006

GMAW – Gas Metal Arc Welding	
TITLE	DESIGNATION: YEAR
Standard Welding Procedure Specification for Argon Plus 25% Carbon Dioxide Shielded Gas Metal Arc Welding (Short Circuiting Transfer Mode) followed by Argon Plus 2% Oxygen Shielded Gas Metal Arc Welding (Spray Transfer Mode) of Carbon Steel (M-1/P-1/S-1, Groups 1 and 2), 1/8 in. through 1 ½ in. Thick, ER70S-3, As-Welded or PWHT Condition, Primarily Pipe Applications.	B2.1-1-233: 2006
Standard Welding Procedure Specification for Argon Plus 2% Oxygen Shielded Gas Metal Arc Welding (Spray Transfer Mode) of Carbon Steel (M-1/P-1/S-1, Groups 1 and 2), 1/8 in. through 1 ½ in. Thick, ER70S-3, Flat Position Only, As-Welded or PWHT Condition, Primarily Pipe Applications.	B2.1-1-235: 2006

GTAW/SMAW Combination of Welding Processes	
TITLE	DESIGNATION: YEAR
Standard Welding Procedure Specification for Gas Tungsten Arc Welding Followed by Shielded Metal Arc Welding of Carbon Steel (M-1/P-1/S-1, Group 1 or 2), 1/8 in. through 1 ½ in. Thick, ER70S-2 and E7018, As-Welded or PWHT Condition, Primarily Plate and Structural Applications.	B2.1-1-021: 2018
Standard Welding Procedure Specification for Gas Tungsten Arc Welding followed by Shielded Metal Arc Welding of Carbon Steel (M-1/P-1, Groups 1 or 2), 1/8 in. (3 mm) through 1 ½ in. (38 mm) Thick, ER70S-2 and E7018, As-Welded or PWHT Condition, Primarily Pipe Applications.	B2.1-1-209: 2019
Standard Welding Procedure Specification for Gas Tungsten Arc Welding with Consumable Insert Root Followed by Shielded Metal Arc Welding of Carbon Steel (M-1/P-1/S-1, Group 1 or 2), 1/8 in. through 1 ½ in. Thick, INMs-1, ER70S-2, and E7018 As-Welded or PWHT Condition, Primarily Pipe Applications.	B2.1-1-211: 2012

GMAW/FCAW – Combination of Welding Processes	
TITLE	DESIGNATION: YEAR
Standard Welding Procedure Specification for Argon Plus 25% Carbon Dioxide Shielded Gas Metal Arc Welding (Short Circuiting Transfer Mode) Followed by Argon Plus 25% Carbon Dioxide Shielded Flux Cored Arc Welding of Carbon Steel (m-1/P-1/S-1, Groups 1 and 2), 1/8 in. through 1 ½ in. Thick, ER70S-3 and EXT-X, As-Welded or PWHT Condition, Primarily Pipe Applications.	B2.1-1-232: 2006

## Austenitic Stainless Steel — (M8/P8 Materials)

SMAW — Shielded Metal Arc Welding	
TITLE	DESIGNATION: YEAR
Standard Welding Procedure Specification for Shielded Metal Arc Welding of Austenitic Stainless Steel (M-8/P-8/S-8, Group 1), 1/8 in. through 1½ in. Thick, As-Welded Condition, Primarily Plate and Structural Applications.	B2.1-8-023: 2018
Standard Welding Procedure Specification for Shielded Metal Arc Welding of Austenitic Stainless Steel (M-8/P-8/S-8, Group 1), 1/8 in through 1½ in. Thick, E3XX-XX, As-Welded Condition, Primarily Pipe Application.	B2.1-8-213: 201 <u>2</u>

GTAW — Gas Tungsten Arc Welding	
TITLE	DESIGNATION: YEAR
Standard Welding Procedure Specification for Gas Tungsten Arc Welding of Austenitic Stainless Steel (M-8/P-8/S-8, Group 1), 1/16 in. through 1 ½ in. Thick, ER3XX, As-Welded Condition, Primarily Plate and Structural Applications.	B2.1-8-024: 2012
Standard Welding Procedure Specification for Gas Tungsten Arc Welding of Austenitic Stainless Steel (M-8/P-8/S-8, Group 1), 1/16 in. through 1 ½ in. thick, ER3XX, As-Welded Condition, Primarily Pipe Applications.	B2.1-8-212: 2012

Standard Welding Procedure Specification for Gas Tungsten Arc Welding With Consumable Insert Root of Austenitic Stainless Steel (M-8/P-8/S-8, Group 1), 1/8 in. through 1 ½ in. Thick, IN3XX and ER3XX As-Welded Condition, Primarily Pipe Applications.	B2.1-8-215: 2012
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Combination Processes GTAW/SMAW	
TITLE	DESIGNATION: YEAR
Standard Welding Procedure Specification for Gas Tungsten Arc Welding followed by Shielded Metal Arc Welding of Austenitic Stainless Steel (M-8/P-8/S-8, Group 1), 1/8 in. through 1 ½ in. Thick, ER3XX and E3XX-XX, As-Welded Condition, Primarily Plate and Structural Applications.	B2.1-8-025: 2012
Standard Welding Procedure Specification for Gas Tungsten Arc Welding Followed by Shielded Metal Arc Welding of Austenitic Stainless Steel (M-8/P-8/S-8, Group 1), 1/8 in. through 1 ½ in. Thick, ER3XX and E3XX-XX, As-Welded Condition, Primarily Pipe Applications.	B2.1-8-214: 2012
Standard Welding Procedure Specification for Gas Tungsten Arc Welding with Consumable Insert Root followed by Shielded Metal Arc Welding of Austenitic Stainless Steel (M-8/P-8/S-8, Group 1), 1/8 in. through 1 ½ in. Thick, IN3XX, ER3XX, and E3XX-XX As-Welded Condition, Primarily Pipe Applications.	B2.1-8-216: 2012

### Combination of Carbon Steel (M-1/P-1 Material) To Austenitic Stainless Steel (M-8/P-8 Material)

SMAW — Shielded Metal Arc Welding	
TITLE	DESIGNATION: YEAR
Standard Welding Procedure Specifications for Shielded Metal Arc Welding of Carbon Steel (M-1/P-1/S-1, Groups 1 or 2) to Austenitic Stainless Steel (M-8/P-8/S-8, Group 1), 1/8 in. through 1 ½ in. Thick, E309 (L)-15, -16, or -17, As-Welded Condition, Primarily Pipe Applications.	B2.1-1/8-228: 2013

GTAW — Gas Tungsten Arc Welding	
TITLE	DESIGNATION: YEAR
Standard Welding Procedure Specification for Gas Tungsten Arc Welding of Carbon Steel (M-1/P-1/S-1, Groups 1 or 2) to Austenitic Stainless Steel (M-8/P-8/S-8, Group 1), 1/16 in. (1.6 mm) through 1 ½ in. Thick, ER309(L), As-Welded Condition, Primarily Pipe Applications.	B2.1-1/8-227: 2013
Standard Welding Procedure Specifications for Gas Tungsten Arc Welding with Consumable Insert Root of Carbon Steel (M-1/P-1/S-1, Groups 1 or 2) to Austenitic Stainless Steel (M-8/P-8/S-8, Group 1), 1/16 in. (1.6 mm) through 1½ in. Thick, IN309 and ER309(L), As-Welded Condition, Primarily Pipe Applications.	B2.1-1/8-230: 2013

GTAW/SMAW Combination of Welding Processes	
TITLE	DESIGNATION: YEAR
Standard Welding Procedure Specifications for Gas Tungsten Arc Welding followed by Shielded Metal Arc Welding of Carbon Steel (M-1/P-1/S-1,Groups 1 or 2) to Austenitic Stainless Steel (M-8/P-8/S-8, Group 1), 1/8 in through 1½ in. Thick, ER309 (L) and E309 (L)-15, -16, or -17, As-Welded Condition, Primarily Pipe Applications.	B2.1-1/8-229: 2013
Standard Welding Procedure Specifications for Gas Tungsten Arc Welding with Consumable Insert Root followed by Shielded Metal Arc Welding of Carbon Steel (M-1/P-1/S-1, Groups 1 or 2) to Austenitic Stainless Steel (M-8/P-8/S-8, Group 1), 1/8 In. through 1½ in. Thick, IN3009, ER309, and E309-15, -16, or -17 or IN309, ER309 (L) and ER309 (L)-15, -16, or -17, As-Welded Condition, Primarily Pipe Applications.	B2.1-1/8-231: 2015

## Chromium Molybdenum Steel (M4/P4 and M5A/P5A Materials)

SMAW — Shielded Metal Arc Welding	
TITLE	DESIGNATION: YEAR
Standard Welding Procedure Specifications for Shielded Metal Arc Welding of Chromium-Molybdenum Steel (M-4/P-4, Group 1 or 2), E8018-B2, 1/8 in. through 1 ½ in. Thick, As-Welded Condition, 1/8 in. through 1½ in. Thick, PWHT Condition, Primarily Pipe Applications.	B2.1-4-218: 2009
Standard Welding Procedure Specifications for Shielded Metal Arc Welding of Chromium-Molybdenum Steel (M-5A/P-5A), E9018-B3, 1/8 in. through 1½ in. Thick, As-Welded Condition, 1/8 in. through 1½ in. Thick, PWHT Condition, Primarily Pipe Applications.	B2.1-5A-223: 2009

GTAW — Gas Tungsten Arc Welding		
TITLE	DESIGNATION: YEAR	
Standard Welding Procedure Specifications for Gas Tungsten Arc Welding of Chromium-Molybdenum Steel (M-4/P-4, Group 1 or 2), ER80S-B2, 1/8 in. through 1 ½ in. Thick, As-Welded Condition, 1/8 in. through ¾ in. Thick, PWHT Condition, Primarily Pipe Applications.	B2.1-4-217: 2009	
Standard Welding Procedure Specifications for Gas Tungsten Arc Welding (Consumable Insert Root) of Chromium-Molybdenum Steel (M-4/P-4, Group 1 or 2), E8018-B2, 1/8 in. through 1 ½ in. Thick, As-Welded Condition, 1/8 in. through ¾ in. Thick, PWHT Condition, IN515 and ER80S-B2, Primarily Pipe Applications.	B2.1-4-220: 2009	
Standard Welding Procedure Specifications for Gas Tungsten Arc Welding of Chromium-Molybdenum Steel (M-5A/P-5A), ER90S-B3, 1/8 in. through 1½ in. Thick, As-Welded Condition, 1/8 in. through 3/4 in. (19 mm) Thick, PWHT Condition, Primarily Pipe Applications.	B2.1-5A-222: 2009	

Standard Welding Procedure Specifications for Gas Tungsten Arc Welding (Consumable Insert Root) of Chromium-Molybdenum Steel (M-5A/P-5A), 1/8 in. through 1-1/2 in. Thick, As-Welded Condition, 1/8 in. through 3/4 in. Thick, PWHT Condition, IN521 and ER90S-B3, Primarily Pipe Applications.	B2.1-5A-225: 2009
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GTAW/SMAW Combination of Welding Processes		
TITLE	DESIGNATION: YEAR	
Standard Welding Procedure Specifications for Gas Tungsten Arc Welding (Consumable Insert Root) followed by Shielded Metal Arc Welding of Chromium- Molybdenum Steel (M-4/P-4, Group 1 or 2), 1/8 in. through 1-1/2 in. Thick, As-Welded Condition, 1/8 in. through 1 ½ in. Thick, PWHT Condition, IN515, ER80S-B2, and E8018-B2, Primarily Pipe Applications.	B2.1-4-221: 2009	
Standard Welding Procedure Specifications (SWPS) for Gas Tungsten Arc Welded followed by Shielded Metal Arc Welding of Chromium-Molybdenum Steel (M-4A/P-4, Group 1 or 2), 1/8 in. through 1/2 in. Thick, As-Welded Condition, 1/8 in. through 1½ in. Thick, PWHT Condition, ER80S-B2 and E8018-B2, Primarily Pipe Applications.	B2.1-4-219: 2009	
Standard Welding Procedure Specifications for Gas Tungsten Arc Welded followed by Shielded Metal Arc Welding of Chromium-Molybdenum Steel (M-5A/P-5A), 1/8 in. through 1½ in. Thick, As-Welded Condition, 1/8 in. through 1½ in. Thick, PWHT Condition, ER90S-B3 and E9018-B3, Primarily Pipe Applications	B2.1-5A-224: 2009	
Standard Welding Procedure Specifications for Gas Tungsten Arc Welding (Consumable Insert Root) followed by Shielded Metal Arc Welding of Chromium-Molybdenum Steel (M-5A/P-5A), 1/8 in. through 1½ in. Thick, As- Welded Condition, 1/8 in. through 1½ in. Thick, PWHT Condition, IN521, ER90S-B3, and E9018-B3, Primarily Pipe Applications.	B2.1-5A-226: 2009	

### Routine repairs of Div.2 & or Div.3 vessels

Part 3, 3.3.2 a) Submitted by: Paul Shanks

**Explanation of Need:** An interpretation is scheduled to be issued under item number 19-26 asserting that Routine repairs are not to be used on Div.2 or Div.3 vessels. Rather than require review of an interpretation which may expire in two years the body of the code should make it clear that Routine repairs are not compatible with div.2 or div.3 vessels.

**Background Information:** 3.3.5.2 b) makes clear that an Inspector will make the acceptance inspection and sign the R1, the provision in 3.3.2 to waive the AI involvement or routine repairs is simply not applicable.

## Proposed Change: 3.3.2 ROUTINE REPAIRS

a) Routine repairs are repairs for which the requirements for in-process involvement by the Inspector and stamping by the "R" Certificate Holder may be waived as determined appropriate by the Jurisdiction and the Inspector. As such routine repairs are not acceptable for ASME Section VIII Div.2 or Div. 3 vessels. All other applicable requirements of this code shall be met. Prior to performing routine repairs, the "R" Certificate Holder should determine that routine repairs are acceptable to the Jurisdiction where the pressure-retaining item is installed;

# <u>Define "Verify" in the NBIC Glossary</u> Part 3, 9.1 Submitted by: Terry Hellman

**Explanation of Need:** Defining "Verify" in the NBIC Part 1, 2, 3, and 4 to align with the definition in NB-263, RCI-1, Rules for Commissioned Inspectors.

**Background Information:** The need for the definition of "verify" was initiated from Interpretation Item 18-03, which addresses which Inspector (i.e. "IS" Commissioned or "R" Endorsement) signs the FFSA Form NB-403 when an "R" Certificate Holder is involved with a repair in that region as well as determine what level of review of the Fitness-for-Service the Inspector is expected to complete.

# Proposed Change: 9.1 DEFINTIONS

<u>Verify – To determine that a particular action has been performed in accordance with the requirements either by witnessing the action or reviewing records.</u>

# Stamping requirements for routine repairs Part 3, 3.3.2 & 5.7.2 b) Submitted by: Kathy Moore

**Explanation of Need:** This would offer traceability to the R-Stamp holder responsible for the work.

**Background Information:** Requested by the Chief of Texas.

## Proposed Change:

#### 3.3.2 ROUTINE REPAIRS

a) Routine repairs are repairs for which the requirements for in-process involvement by the Inspector and stamping by the "R" Certificate Holder may be waived as determined appropriate by the Jurisdiction and the Inspector. All other applicable requirements of this code shall be met. Prior to performing routine repairs, the "R" Certificate Holder should determine that routine repairs are acceptable to the Jurisdiction where the pressure-retaining item is installed;

#### 5.7.2 STAMPING REQUIREMENTS FOR REPAIRS

- a) Pressure-retaining items repaired in accordance with the NBIC shall be stamped as required by this section.
- b) Subject to the acceptance of the Jurisdiction and the concurrence of the Inspector, nameplates and stamping may not be required for routine repairs (see NBIC Part 3, 3.3.2). In all cases, the type and extent of repairs necessary shall be considered prior to waiving the requirement.
- eb) Stamping or nameplate shall be applied adjacent to the original manufacturer's stamping or nameplate. A single repair nameplate or stamping may be used for more than one repair to a pressure-retaining item, provided each is carried out by the same certificate holder. The date of each repair, corresponding with the date on associated Form R-1, shall be stamped on the nameplate.

#### Part 3, 3.4.4

Submitted by: Paul Shanks

**Explanation of Need:** ASME Section VIII Div.1 Mandatory Appendix 44 paragraph 44-6.2(g) clearly sets out that a vessel built to those rules needs to be re-stretched, having had repair welding. It is not clear if ASME is referring to in process (at the original manufactures location) repairs or post construction repairs. However, the NBIC is currently silent on this and this potential issue should be addressed.

**Background Information:** ASME Section VIII Div.1 Mandatory Appendix 44 establishes rules that allow a vessel to be designed and built for use at low temperatures using allowable stresses which are higher than would normally be allowed at 'room temperature'. The condition for doing so is that said vessels are subject to a pre-stressing operation that actually stretches the base material. The use of these higher stresses is contingent on certain design and manufacturing criteria.

#### **Proposed Change:**

#### 3.4.4 EXAMPLES OF ALTERATIONS

- a) An increase in the maximum allowable working pressure (internal or external) or temperature of a pressure- retaining item regardless of whether or not a physical change was made to the pressure-retaining item;
- b) A decrease in the minimum temperature;
- c) The addition of new nozzles or openings in a boiler or pressure vessel except those classified as repairs;
- d) A change in the dimensions or contour of a pressure-retaining item;
- e) In a boiler, Heat Recovery Steam Generator (HRSG), or Pressure Retaining Item (PRI), an increase in the steaming capacity by means of increasing heating surface, total heat input, firing rate, adjustment, or other modification to the primary or auxiliary heat source, resulting in the steaming capacity exceeding the original Manufacturer's Minimum Required Relieving Capacity (MRRC) as described on the nameplate and or Manufacturer's Data Report (MDR);
- f) The addition of a pressurized jacket to a pressure vessel;
- g) Except as permitted in NBIC Part 3, 3.3.3 s); replacement of a pressure retaining part in a pressure retaining item with a material of different allowable stress or nominal composition from that used in the original design;
- h) The addition of a bracket or an increase in loading on an existing bracket that affects the design of the pressure-retaining item to which it is attached;
- i) The replacement of a pressure relieving device (PRD) as a result of work completed on a pressure-retaining item (PRI) that changes the resultant capacity to exceed the minimum required relieving capacity (MRRC) required by the original code of construction as described on the original Manufacturer's Data Report;

- j) For plate heat exchangers, in addition to the applicable examples of alterations above, the following changes from what is listed on the MDR or described on the Original Equipment Manufacturer's (OEM)-drawing:
  - 1) For heat transfer plates:
    - a. A change in material grade or nominal thickness;
    - b. A reduction in number beyond any minimum, or when no minimum is specified;
    - c. An increase in number beyond any maximum, or when no maximum is specified;
    - d. A change in model type;
  - 2) Any change in material whether described at 3.3.3 s) or as described at 3.4.4 g):
    - a. A change in connection bolt or frame compression bolt diameter or material grade;
- k) Performing postweld heat treatment where none was originally performed on the pressure retaining item; and
- I) The installation of a welded leak box-; and

m) Welding on a vessel marked with the cold stretching 'CS' mark without subsequent renewed cold stretching operating witness by the Inspector.

## Revision to Part 3, 3.2.2 e)

Part 3, 3.2.2 e)

Submitted by: Eric Feeney – efeeney@teiservices.com

**Explanation of Need:** The certificate holder should not have to explain or justify why a part was not pressure tested in the manufacturing stage. PG-106.8 of Section I allows the part to be fabricated and shipped as such therefore no explanation should be required.

**Background Information:** The certificate holder is rarely the supplier of the replacement parts. Parts are typically supplied by the owner or OEM. The current wording places the onus on the certificate holder to explain why the parts were not tested in accordance with the original code of construction. (Section I for the inquirer) The reason is most likely a cost savings to the supplier and even if it was, the certificate holder has no authority to rectify this. My company, for one, takes ownership of the parts at the time of receipt inspection at the site of installation.

## Proposed Change: 3.2.2 REPLACEMENT PARTS

e) Replacement parts addressed by 3.2.2 c) or d) above shall receive a pressure test as required by the original code of construction. If replacement parts have not been pressure tested as required by the original code of construction prior to installation they may be installed without performing the original code of construction pressure test provided the owner, the Inspector and, when required, the Jurisdiction accept the use of one or a combination of the examination and test methods shown in Part 3, Section 4, paragraph 4.4.1 (for repairs) or 4.4.2 (for alterations). The R Certificate Holder responsible for completing the R Form shall note in the Remarks section of the R Form the examination(s) and test(s) performed, and the reason the replacement part was not tested in accordance with the original code of construction.

Subject: NBIC Part 3, Qualification of Weld Procedures by Multiple Organizations

**Proposal:** To add words to 2.2.1 permitting simultaneous qualification of weld procedures by more than one organization.

**Explanation:** Cost of qualification of weld procedures can represent a considerable cost for a manufacturer for labor, materials, testing etc. Further, when new materials are being introduced to the industry, availability can be extremely limited. Section IX will introduce new rules (already board approved) under item 18-555 (provided in the background information), which provides the framework to allow multiple organizations to supervise the welding of a single test coupon. The rules only permit this when it is expressly permitted by the referencing code. This proposal intends to add words to 2.2.1 of Part 3 to allow Manufacturers to take advantage of the new rules coming to Section IX.

Such testing sessions have already taken place, organized by EPRI, for qualification of repair procedures for Welding Method 6 and Supplement 8.

#### **Current Wording**

#### 2.2.1 PROCEDURE SPECIFICATIONS

A procedure specification is a written document providing direction to the person applying the material joining process. Welding, brazing and fusing shall be performed in accordance with procedure specifications for welding (WPS), brazing (BPS), and fusing (FPS) qualified in accordance with the original code of construction or the construction standard or code selected. When this is not possible or practicable, the procedure specification may be qualified in accordance with ASME Section IX.

#### **Proposed Wording**

#### 2.2.1 PROCEDURE SPECIFICATIONS

A procedure specification is a written document providing direction to the person applying the material joining process. Welding, brazing and fusing shall be performed in accordance with procedure specifications for welding (WPS), brazing (BPS), and fusing (FPS) qualified in accordance with the original code of construction or the construction standard or code selected. When this is not possible or practicable, the procedure specification may be qualified in accordance with ASME Section IX.

Welding procedures may be simultaneously qualified by more than one organization under the rules of ASME Section IX QG-106.4, provided that each organization accepts full responsibility for any such qualifications and complies with the other requirements of Section IX for documentation of welding records.

The manufacturer's or assembler's written quality control program shall include requirements for addressing the rules of Section IX QG-106.4.