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THE NATIONAL BOARD OF BOILER AND PRESSURE VESSEL INSPECTORS

NATIONAL BOARD TASK GROUP ON INTERPRETATIONS

AGENDA

Meeting of January 11th, 2020
San Antonio, TX

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**

5. **Announcements**

   The National Board will be hosting a reception for all committee members and visitors on Wednesday evening at 5:30pm.

6. **Adoption of the Agenda**

7. **Approval of the Minutes of the July 13th, 2020 Meeting**

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

8. **Review of Rosters**
   a. **Membership Nominations**

   b. **Membership Reappointments**

9. Interpretations

Item Number: 20-3	NBIC Location: Part 3, 3.3.4.8	Attachment Pages 1

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.

July 2020 Meeting Action: J. Siefert presented that Action Item 20-10 may address this inquire and submitted a **Progress Report** to await the outcome of Item 20-10.

Item Number: 20-11	NBIC Location: Part 3, 3.3.3	Attachment Page 4

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.

July 2020 Meeting Action: K. Moore presented. Discussion took place on if tubsheet replacement activities may qualify as a Repair or Alteration. Interpretation 17-11 was referenced, and P. Becker indicated that she would be opening a new Action Item to revise the definition of an alteration in 3.4.4 d) for clarification. It was decided that the proposal needs additional work at the TG Interpretation level, and the proposal can be submitted to SC R&A via Letter Ballot once ready. This was a **Progress Report**.

New Interpretation Requests:

Item Number: 20-66	NBIC Location: Part 3, 3.3.2 e)	Attachment Page 6

General Description: Possible contradictory interpretations of Part 3, 3.3.2 e) 2)

Subgroup: Repairs and Alterations

Task Group: R. Underwood (PM)

Explanation of Need:
Two previously issued interpretations, 95-14 and 95-21, seem to be contradictory with the NBIC itself. The reason for the interpretation request is that two previously published NBIC Interpretations and the NBIC itself seem to be contradictory. Interpretations 95-14 and 95-21 lead the reader to conclude that if the original vessel was postweld heat treated, then the addition of refractory clips by welding, regardless of size, without postweld heat treatment is an alteration. However, NBIC Part 3 [2019 Edition], 3.3.3 b)1) and 2) list addition of welded attachments to pressure parts, such as: Studs for insulation or refractory lining and hex steel or expanded metal for refractory lining as "Examples of Repairs". Furthermore, NBIC Part 3 [2019 Edition], 3.3.2 e) 2) states: "The following repairs may be considered as routine repairs and shall be limited to these categories:

2) The addition or repair of nonload bearing attachments to pressure-retaining items where postweld heat treatment is not required;

Item Number: 20-77	NBIC Location: Part 3, 1.3.2	Attachment Page 7

General Description: Authorization of repair/alteration activities

Subgroup: Repairs and Alterations

Task Group: None assigned.

Explanation of Need:
Many R-certificate holders also have U or S stamps and as such have a regular AI (with R endorsement) to whom they tend to have review repair and alteration packages. However, when the physical work will be conducted 'out of state' travel limitations and or jurisdictional authorization requirement prevent the local AI from making the final acceptance inspection thus another AI must do that work, para 1.3.2 a) makes clear that both Inspectors have to be employed by the same agency. Form R-2 has 2 Inspector sign off locations but does not make clear if the two Inspectors must be from the same AIA or not.

Item Number: 20-78	NBIC Location: Part 3, 3.3.3 s) & 3.4.4 d)	Attachment Page 8

General Description: Repairs and Alterations of Tube Bundles

Subgroup: Repairs and Alterations

Task Group: None assigned.

Explanation of Need:
Submission is for R Certificate Holders we provide Repair Inspection services for. NBIC Part 3, 3.3.3 s) seems to allow to be a repair, but under 3.4.4 d) where the dimensions change it might be classified as an alteration.)

Item Number: 20-81	NBIC Location: Part 3, 4.4.2 a) 1)	Attachment Page 10

General Description: Minimum Required Test Pressure for Alteration Activities

Subgroup: Repairs and Alterations

Task Group: R. Underwood (PM)

Explanation of Need:
To provide clarity that the minimum test pressure for alterations shall be in accordance with the original code of construction.

Item Number: 20-89	NBIC Location: Part 3, 4.4.2	Attachment Page 11

General Description: LIQUID PRESSURE TEST EXAMINATION METHODS APPLICABLE TO ALTERATIONS

Subgroup: Repairs and Alterations

Task Group: None assigned.

Explanation of Need:
For Alteration can Minimum Test Pressure Shall be Design Pressure or MAWP considering same Condition as Clause 4.4.1 of Pressure Test for Repairs.

Item Number: 20-90	NBIC Location: Part 3, 1.4.1	Attachment Page 12

General Description: 1.4.1 ACCREDITATION PROCESS / NB-415- Certification of Scope

Subgroup: Repairs and Alterations

Task Group: None assigned.

Explanation of Need:
The NBIC Certification scope Does not Restrict the Repair Organization to Perform Based on their ASME Certification of scope, as long as Manual Controls are addressed for the Design and Repair/ Fabrication Scope they can perform Repair and Alteration.

Item Number: 20-91	NBIC Location: Part 3, 1.5.1 h)	Attachment Page 13

General Description: Mechanical Repair Procedures

Subgroup: Repairs and Alterations

Task Group: R. Underwood (PM)

Explanation of Need:
Part 3, paragraph 1.5.1(h) requires that control of mechanical assembly/repair procedures be addressed in the R Certificate Holder's Quality Manual. Over the last year or so, there have been National Board Team Leaders requesting these procedures (during joint reviews) for work such as rolling tubes in a boiler and replacing a bolted fitting on a pressure retaining item. This has resulted in questions from certificate holders and Inspectors about why an "R" certificate holder is required to have procedures for mechanical work that doesn't even require an "R" Stamp.

10. Future Meetings

July 12th-15th, 2021 – Cincinnati, OH
January 10th-13th, 2022 – TBD

11. Adjournment

Respectfully submitted,

Jonathan Ellis

Jonathan Ellis
NBIC Secretary

PROPOSED INTERPRETATION

Inquiry No.	**20-3**
Source	Nathan Carter, HSB 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	

PROPOSED INTERPRETATION

Inquiry No.	**20-11**
Source	Hugh-Jean Nel, Sasol Hugh-Jean.Nel@sasol.com
Subject	Scope of Repairs **Background:** 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 item 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 1	~~Can~~ May multiple repair activities referenced in 3.3.3 of Part 3 be listed on a single Form R-1 Report when performing a repair on a pressure retaining item?
Committee's Reply	Yes
Rationale	There is nothing in the NBIC that restrict the repair work performed on one vessel at the same time.
Committee's Question 2	Other than tube plugging, ~~I~~is it considered an alteration when the heat transfer surface(s)~~tube length~~ of a heat exchanger is ~~changed~~ changed from its original design~~while replacing tube sheets~~ on a ~~ASME~~ ~~Section VIII, Div 1~~ pressure vessel?
Committee's Reply	Yes~~.~~ Reference NBIC Part 3,. 3.4.4 d)
Rationale:	~~The tube length is a dimension as mentioned in 3.4.4. d~~

Interp 20-11

3.4.4 EXAMPLES OF ALTERATIONS

d) A change in the dimensions or contour of a pressure-retaining item;

3.3.3 EXAMPLES OF REPAIRS

e) Replacement of heat exchanger tubesheets in accordance with the original design;

INTERPRETATION 98-28

Subject: RC-1050(c) Replacement Parts Fabricated by an "R" Certificate Holder
Appendix 6 Pressure Retaining Replacement Items
RC-1050 Definition of New Replacement Parts

1998 Edition

Question 1: Does RC-1050(c) of the NBIC permit the holder of an "R" Certificate to fabricate by welding new and exact pressure retaining replacement parts for an ASME stamped item that the "R" stamp holder is repairing?

Reply 1: No. ASME replacement parts fabricated by welding that require shop inspection by an Authorized Inspector shall be fabricated by an organization having an appropriate ASME Certificate of Authorization.
Question 2: An ASME stamped item is determined to be corroded beyond repair and the only salvageable part is the ASME Code stamping or nameplate. Is it the intent of the NBIC to permit a holder of an "R" Certificate only to build a complete new and exact pressure retaining replacement item using the original ASME construction Code, Section, Edition and Addenda and same materials, transfer and document the transfer of the ASME stamping or nameplate on an R-1 Form to the new pressure-retaining item and stamp the repair with the "R" stamp?
Reply 2: No.
Question 3: Does the NBIC define the point at which a repair becomes new construction?
Reply 3: No.

PROPOSED INTERPRETATION

Item Number:	**20-66**
Submitted by:	Alexander Garbolevsky Alex_garbolevsky@hsb.com
Subject:	Possible contradictory interpretations of Part 3, 3.3.2 e) 2) **Explanation of Need:** Two previously issued interpretations, 95-14 and 95-21, seem to be contradictory with the NBIC itself. **Background Information:** The reason for the interpretation request is that two previously published NBIC Interpretations and the NBIC itself seem to be contradictory. Interpretations 95-14 and 95-21 lead the reader to conclude that if the original vessel was postweld heat treated, then the addition of refractory clips by welding, regardless of size, without postweld heat treatment is an alteration. However, NBIC Part 3 [2019 Edition], 3.3.3 b)1) and 2) list addition of welded attachments to pressure parts, such as: Studs for insulation or refractory lining and hex steel or expanded metal for refractory lining as "Examples of Repairs". Furthermore, NBIC Part 3 [2019 Edition], 3.3.2 e) 2) states: "The following repairs may be considered as routine repairs and shall be limited to these categories: · 2) The addition or repair of nonload bearing attachments to pressure-retaining items where postweld heat treatment is not required;
NBIC Location:	2019 NBIC Part 3, 3.3.2 e) 2)
Question:	An ASME BPV Code Section VIII, Div. 1 pressure vessel (P-No. 1, 2-1/4 in thick), fabricated in 1971, was completely postweld heat treated (PWHT) in an oven. The vessel nameplate is marked "HT". No special service applies. In 2020, refractory clips are added by welding. The attachment welds are of such size that they are exempted from PWHT per ASME BPV Section VIII, Div. 1, 2019 Edition, Table UCS-56-1 General Note (b)(3)(c). May the welding of the refractory clips be considered as a "routine repair" under NBIC (2019) Part 3, 3.3.2 e) 2)?
Proposed Reply:	Yes.
Committee's Question:	
Committee's Reply:	
Rationale:	

PROPOSED INTERPRETATION

Item Number:	**20-77**
Submitted by:	Paul Shanks paul.shanks@onecis.com
Subject:	Authorization of repair/alteration activities **Explanation of Need:** Many R-certificate holders also have U or S stamps and as such have a regular AI (with R endorsement) to whom they tend to have review repair and alteration packages. However when the physical work will be conducted 'out of state' travel limitations and or jurisdictional authorization requirement prevent the local AI from making the final acceptance inspection thus another AI must do that work, para 1.3.2 a) makes clear that both Inspectors have to be employed by the same agency. Form R-2 has 2 Inspector sign off locations but does not make clear if the two Inspectors must be from the same AIA or not. **Background Information:** Paragraph 1.3.2 a) situates that the inspectors that authorizes the repair/alteration and the inspector that performs the acceptance inspection be employed by the same AIA. However, the activity of authorizing the repair/alteration is not defined and it is not clear what constitutes authorization. Given that form R-2 has sign off locations for design and constructions, if two different Inspectors sign, should they be employed by the same agency?
NBIC Location:	2019 NBIC Part 3, 1.3.2
Question:	Q1: Given the restriction of employment in paragraph 1.3.2 a) if two inspectors are signing an R-2 may they be employed by different AIA's? Q2: if the answer to the above is yes, does this mean the Inspector making the final acceptance inspection is the only Inspector that is suitable to authorize the inspection?
Proposed Reply:	R1: No. R2: Yes.
Committee's Question:	
Committee's Reply:	
Rationale:	

PROPOSED INTERPRETATION

Item Number:	**20-78**
Submitted by:	Micah Davidian mdavidian@dir.ca.gov
Subject:	Repairs and Alterations of Tube Bundles **Explanation of Need:** Submission is for R Certificate Holders we provide Repair Inspection services for. **Background Information:** For the above questions 1-4, NBIC Part 3, 3.3.3 s) seems to allow to be a repair, but under 3.4.4 d) where the dimensions change it might be classified as an alteration.)
NBIC Location:	2019 NBIC Part 3, 3.3.3 s) & 3.4.4 d)
Question:	Question 1: When a tube bundle is replaced where the new tubesheet material is the same as the original bundle but has a thicker tubesheet due to adding corrosion allowance where the original design did not include corrosion allowance, is this considered a repair or alteration? Question 2: When a tube bundle is replaced where the new tubesheet material is the same as the original bundle but has a thicker tubesheet due to adding additional corrosion allowance to the original design, is this considered a repair or alteration? Question 3: When a tube bundle is replaced where the new tubesheet material is the same as the original bundle but has a thicker tubesheet due to adding thickness for future machining allowance, is this considered a repair or alteration? Question 4: For a tube bundle, does NBIC Part 3, 3.4.4 d) mean that any physical changes e.g. tubesheet thickness, tube wall thickness or length of tubes from the original design will be an alteration? Question 5: If a tube bundle is replaced where the new tubesheet material is the same as the original bundle but has a thicker tubesheet due to ASME Sec VIII, Div. 1, Part UHX tubesheet formulas, is this considered a repair or alteration.
Proposed Reply:	Question 1: Alteration (calculations required) Question 2: Alteration (calculations required) Question 3: Repair Question 4: Some may be repairs others alterations. Question 5: Alteration (calculations required)
Committee's Question:	
Committee's Reply:	

Rationale:	

PROPOSED INTERPRETATION

Item Number:	**20-81**
Submitted by:	Micah Davidian robert_underwood@hsb.com
Subject:	Minimum Required Test Pressure for Alteration Activities **Explanation of Need:** To provide clarity that the minimum test pressure for alterations shall be in accordance with the original code of construction. **Background Information:** I have recently had discussions with some repair firms and Repair Inspectors who believe there are no minimum test pressure requirements when performing liquid pressure tests of alterations since it is not specifically stated in paragraph 4.4.2(a)(1). This interpretation, combined with a new proposal to revise 4.4.2(a)(1) will make it clear that minimum test pressures for alteration activities shall comply with the original code of construction, which I believe is the intent.
NBIC Location:	2019 NBIC Part 3, 4.4.2 a) 1)
Question:	When conducting a liquid pressure test of an alteration activity as described in 4.4.2(a)(1), shall the minimum required test pressure be as specified in the original code of construction?
Proposed Reply:	Yes.
Committee's Question:	
Committee's Reply:	
Rationale:	

PROPOSED INTERPRETATION

Item Number:	**20-84**
Submitted by:	Chris Cantrell Christopher.Cantrell@nebraska.gov
Subject:	Adjustable Packing on Low Pressure Boiler Stop Valves **Explanation of Need:** Jurisdictions need to know if this requirement applies to all low pressure boiler stop valves (steam, hot water heat, and hot water supply) so they can effectively communicate this requirement to their constituents and can enforce the code when new items are installed. **Background Information:** Most new hot water heating boilers and hot water supply boilers are being installed with appropriately-pressure/temperature-rated butterfly valves as their outlet isolation valves. Most butterfly valves that are installed do not have adjustable pressure-type packing glands. Instead, these valves are supplied with EPDM or Viton seals inside the stem housing to prevent water escape. EPDM is rated to 275 F, and Viton is rated to 300 F. It is unclear whether or not the text of the referenced code is a requirement that is specifically intended to apply to water boilers, or if it is a requirement that has simply been in the code and has carried forward through the years. It is also unclear as to the safety basis for requiring adjustable packing for low pressure hot water boiler stop valves.
NBIC Location:	2019 NBIC Part 3, 3.7.5.1 d) 4)
Question:	Does the requirement in NBIC, Part 1, Section 3, paragraph 3.7.5.1(d)(4) that all valves or cocks with stems or spindles shall have adjustable pressure-type packing glands apply to stop valves used on low pressure hot water heating or hot water supply boilers?
Proposed Reply:	No. This requirement applies to stop valves used on low pressure steam boilers only.
Committee's Question:	
Committee's Reply:	
Rationale:	

PROPOSED INTERPRETATION

Item Number:	**20-89**
Submitted by:	Jagadheesan Vellingiri Muthukumaraswamy jaga4021@hotmail.com
Subject:	LIQUID PRESSURE TEST EXAMINATION METHODS APPLICABLE TO ALTERATIONS **Explanation of Need:** For Alteration can Minimum Test Pressure Shall be Design Pressure or MAWP considering same Condition as Clause 4.4.1 of Pressure Test for Repairs. **Background Information:** For an ASME SEC VIII Div 2, Class 1 or Class 2 / ASME SEC I / ASME B 31.1 Equipment is Subjected to Alteration due to Increase in MAWP.
NBIC Location:	2019 NBIC Part 3, 4.4.2
Question:	1. Is it the Intent of the Code that the Minimum Pressure for Liquid Pressure Test for Alteration Shall be as per Original Code of Construction? 2.Can Pressure Test Be Conducted at Design Pressure or MAWP for Alteration Considering Remaining Thickness or Corrosion Condition considering Integrity of the Equipment?
Proposed Reply:	1. No 2. Yes
Committee's Question:	
Committee's Reply:	
Rationale:	

PROPOSED INTERPRETATION

Item Number:	**20-90**
Submitted by:	Jagadheesan Vellingiri Muthukumaraswamy jaga4021@hotmail.com
Subject:	1.4.1 ACCREDITATION PROCESS / NB-415- Certification of Scope **Explanation of Need:** The NBIC Certification scope Does not Restrict the Repair Organization to Peform Based on their ASME Certification of scope, as long as Manual Controls are addressed for the Design and Repair/ Fabrication Scope they can perform Repair and Alteration. **Background Information:** A Repair Organization is Holding an valid R certification under NBIC, and Holds Valid ASME- U Authorization. The Certifcation Scope Under NBIC is issued for Metallic Repair and Alteration, Can the Repair Organization Perform Repair and Alteration on ASME Sec VIII Div 2 / 3 and Section 1 Components.
NBIC Location:	2019 NBIC Part 3, 1.4.1
Question:	1. Is it the Intent of Code that based on the Initial Certification under 1.4.1 / NB-415 Process, and Quality manual Restriction that if the Repair Organization is Authorized for Repair and Alteration on Sec VIII Div 1 Vessels only they are entitled to Perform Repair and alteration of Sec VIII Div 1 Vesels? 2. If the Answer to above Question is No then can the Repair Organization Perform Repair and Alteration on Sec VIII Div 2/Div 3 and Section 1 Components if the controls are addressed in Manual?
Proposed Reply:	1. No 2. Yes
Committee's Question:	
Committee's Reply:	
Rationale:	

PROPOSED INTERPRETATION

Item Number:	**20-91**
Submitted by:	Robert Underwood Robert_Underwood@hsb.com
Subject:	Mechanical Repair Procedures **Explanation of Need:** To provide clarity on whether procedures are required for mechanical repairs that do not require an R Form. **Background Information:** Part 3, paragraph 1.5.1(h) requires that control of mechanical assembly/repair procedures be addressed in the R Certificate Holder's Quality Manual. Over the last year or so, there have been National Board Team Leaders requesting these procedures (during joint reviews) for work such as rolling tubes in a boiler and replacing a bolted fitting on a pressure retaining item. This has resulted in questions from certificate holders and Inspectors about why an "R" certificate holder is required to have procedures for mechanical work that doesn't even require an "R" Stamp.
NBIC Location:	2019 NBIC Part 3, 1.5.1 h)
Question:	Are mechanical repair/assembly procedures that are referenced in Part 3, paragraph 1.5.1(h), required for work where an R Form is not required?
Proposed Reply:	No.
Committee's Question:	
Committee's Reply:	
Rationale:	