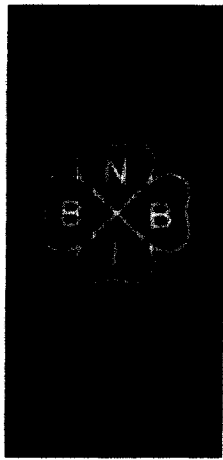


Date Distributed: December 15, 2009



**THE  
NATIONAL  
BOARD**  
OF BOILER AND  
PRESSURE VESSEL  
INSPECTORS

## **SUBCOMMITTEE ON PRESSURE RELIEF DEVICES**

### *AGENDA*

---

*Meeting of January 20, 2010  
Austin, Texas*

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 a.m.**
2. **Announcements**
3. **Adoption of the Agenda**
4. **Approval of meeting Minutes of July 2009**
5. **Review of the Roster (Attachment 1)**

Mr. Kevin Fitzsimmons and Mr. Thakor Patel are eligible for reappointment to this subcommittee. A vote will be taken.

Mr. Glyn Humphries' plant has closed. By procedure this forces him to resign from his position on this subcommittee.

6. **Interpretations (Attachment 2)**

**IN10-0101 Proposed Question 1:** Is a “changeover” valve as specified in ASME Code Case 2254 allowed for use between the boiler and the required safety valve if all conditions of Code Case 2254 have been met? **Proposed Question 2:** Does the National Board Inspection Code Committee have any plans to adopt the ASME Code Case 2254 and revised the requirements of NBIC Part 1 Section 2.9.5.1 c) such that allowance would be made for the use of “Changeover” valves if the MAWP of the boiler was 800 psig or below and all of the conditions set forth in the ASME Code Case have been met?

**Proposed Answer Question 1:** Yes. 2008 NBIC Part 1, Section 2 2.9.5.1 c) states “No valve of any description should be placed between the safety or safety relief valves and the boiler” and as defined in the Introduction of the Code: “Should-indicates a preferred but not mandatory means to accomplish the requirement unless specified by others such as the Jurisdiction.”

**Proposed Answer Question 2:** Yes. The Committee (NBIC), while remaining consistent with the intended purpose of the Code as outlined in the Forward “It is organized for the purpose of promoting greater safety to life and property by securing concerted action and maintaining uniformity in post-construction activities of pressure-retaining items, thereby ensuring acceptance and interchangeability among jurisdictional authorities responsible for the administration and enforcement of various codes and standards” and “The general philosophy underlying the NBIC is to parallel those provisions of the original code of construction as they can be applied to post-construction activities”, recognizes that certain NBIC states (i.e. California) have accepted the use of “Changeover” valves as specified in ASME Code Case 2254 or they have written into their States Boiler Laws (multiple states) to adopt the latest ASME Code Cases and that the Code Case will allow an owner, operator, or owner-operator the ability to switch out a malfunctioning safety or safety relief valve without a complete boiler shutdown and system de-pressure while maintaining the uninterrupted safety relief protection thus increasing the safe reliability of the boiler while decreasing the risk to personnel and property associated with shutdown and start-up operations.

7. **Public Review Comments for 2010 Addendum Cycle A**

There are no public review comments assigned to this subcommittee.

8. **Action Items (Attachment 3)**

**NB06-0101 Part 3 S7.5 (b) SC on PRD** This item concerns a proposed revision to paragraph Part 3

S7.5 b) of the NBIC to revise requirements relating to the source of specifications for replacement parts. A proposal was made to the SC on R and A and it failed. It was sent back to the task group for more work. A task group of M. Brodeur (Chair), A. Tannis, S. Cammeresi, B. Nutter, A. Syed, J. Richardson, T. Patel, K. Simmons and R. McCaffrey is assigned. (See attachment 3, pgs. 1-3)

July 2006

A progress report was given,

January 2007

A progress report was given.

July 2007

It was moved and seconded to close this item based upon the previously issued interpretation number 04-08. A vote was taken with three in favor and four opposed to the motion. The chair indicated the item would continue to be studied.

January 2008

After discussion, a proposed revision to Part 3, S7.5a was voted upon and was approved with two negatives from DeMichael and Kevin Fitzsimmons. This proposal was made to the SC on R and A and it failed. It was sent back to the task group for more work.

July 2008

Mr. Patel reported that there had been discussions with the task group; however there was no proposal for this meeting. This was considered a progress report.

January 2009

It was unanimously approved to letter ballot this item. The letter ballot failed. It was decided to keep the item on the agenda to be discussed at the July meeting.

July 2009

A proposal was made to the subcommittee and it passed in the subgroup but with three negative votes. The NBIC Committee disapproved with the proposal so it was sent back to the SC for more work.

January 2010

Ms. Brodeur is expected to report.

**NB07-1301 Part 3 3.2.2 SC on PRD** Quality control systems for replacement parts. This item addresses requirements for the manufacturing and quality control for replacement parts to be used for pressure relief valve. A task group of A. Cox (Chair), D. DeMichael, T. Patel, K. Simmons and K. Fitzsimmons has been assigned. (See Attachment 3, pgs. 4-5)

July 2007

A progress report was given.

January 2008

A progress report was given.

July 2008

It was reported that the task group is waiting for actions which may be taken under item number NB06-0101 to determine their affect on this item.

January 2009

No actions were taken at this meeting pending the outcome of NB06-0101.

July 2009

A progress report was given.

January 2010

Mr. Cox is expected to report.

## **9. Future Meetings**

July 2010, Columbus, Ohio

January 2011, Austin, Texas

## **10. Adjournment**

Respectfully Submitted,

Joseph F. Ball

Secretary

:rh

*H:\ROBIN-Active Documents\NBIC Secretarial Documents\Committees\SC on PRD\Agendas\Agenda PRD 0110.doc*

# SC on Pressure Relief Devices

<b>Member</b>	<b>Title</b>	<b>ExpirDate</b>	<b>Interest Category</b>
Ball, Joseph F.	Secretary		
Brodeur, Marianne		8/27/2012	NB Certificate Holders
Cammeresi, Sid		8/27/2012	NB Certificate Holders
Cox, J. Alton	Vice Chair	1/21/2012	General Interest
DeMichael, Denis B.		8/27/2012	Users
Donalson, R. W.		8/27/2012	Manufacturer
Fitzsimmons, Kevin		1/11/2010	NB Certificate Holders
Hart, Frank	Chair	8/27/2012	Manufacturer
McCaffrey, Raymond		7/31/2011	General Interest
Patel, Thakor		1/11/2010	Manufacturer

<b>Total Members:</b>	<b>9</b>
-----------------------	----------

**Attachment 2****PROPOSED INTERPRETATION**

<b>Inquiry No.</b>	IN10-0101
<b>Source</b>	Chuck Easterbrooks
<b>Subject</b>	Part 1 2.9.5.1 c)
<b>Edition</b>	2007
<b>Question</b>	<p>1: Is a “Changeover” valve as specified in ASME Code Case 2254 allowed for use between the boiler and the required safety relief valve if all of the conditions of the Code Case 2254 have been met?</p> <p>2: Does the National Board Inspection Code Committee have any plans to adopt the ASME Code Case 2254 and revise the requirements of NBIC Part 1 2.9.5.1 c) such that allowance would be made for the use of “Changeover” valves if the MAWP of the boiler was 800 psig or below and all of the conditions set forth in the ASME Code Case have been met?</p>
<b>Reply</b>	<p>1: Yes. 2008 NBIC Part 1, Section 2, 2.9.5.1 (c) states” No valve of any description <u>should</u> be placed between the safety or safety relief valves and the boiler” and as defined in the Introduction of the Code: “Should – indicates a preferred but not mandatory means to accomplish the requirement unless specified by others such as the Jurisdiction”</p> <p>2: The Committee (NBIC), while remaining consistent with the intended purpose of the Code as outlined in the Forward “It is organized for the purpose of promoting greater safety to life and property by securing concerted action and maintaining uniformity in post-construction activities of pressure-retaining items, thereby ensuring acceptance and interchangeability among jurisdictional authorities responsible for the administration and enforcement of various codes and standards” and “The general philosophy underlying the NBIC is to parallel those provisions of the original code of construction, as they can be applied to post-construction activities”, recognizes that certain NBIC States (i.e. California) have accepted the use of “Changeover” valves as specified in ASME Code Case 2254 or they have written into their States Boiler Laws (multiple States) to adopt the latest ASME Code Cases and that the Code Case will allow an owner, operator, or owner-operator the ability to switch out a malfunctioning safety or safety relief valve without a complete boiler shutdown and system depressure while maintaining the uninterrupted safety relief protection, thus increasing the safe reliability of the boiler while decreasing the risk to personnel and property associated with shutdown and</p>

	start-up operations.				
<b>Committee's Question</b>					
<b>Committee's Reply</b>					
<b>Rationale</b>					
<b>SC Vote</b>	Unanimous	No. Affirmative	No. Negative	No. Abstain	No. Not Voting
<b>NBIC Vote</b>	Unanimous	No. Affirmative	No. Negative	No. Abstain	No. Not Voting
<b>Negative Vote Comments</b>					



HESS CORPORATION  
Seminole Gas Processing Plant  
PO Box 1570  
Seminole, Texas 79360

Chuck Easterbrooks  
QA/QC Supervisor  
Seminole Gas Processing Plant  
(432) 758-8649 office  
(432) 209-1006 cell  
FRX: (432) 758-8635

Attn: National Board Inspection Code Committee  
Subject: NBIC 2007 Part 1 Section 2.9.5.1 C) Mounting and Discharge Requirements

Background: In 1998 ASME Boiler and Pressure Vessel Code Committee adopted and enacted Code Case 2254 which allowed for the installation of "Changeover" valves between safety valves or safety relief valves on Section I boilers if the MAWP of the boiler was 800 psig or less and the crossover valves met strict conditions established in the Code Case. A number of NBIC States have either adopted the use of "Changeover" valves or have elected to allow for the use of ASME approved Code Cases as applicable to that State's boiler regulations. The "Changeover" valves permit the user to service safety or safety relief valves without the need to shutdown the effected equipment while still maintaining 100% relief capacity, thus removing inherent safety issues related to the startup and shutdown activities.

Question 1:

Is a "Changeover" valve as specified in ASME Code Case 2254 allowed for use between the boiler and the required safety relief valve if all of the conditions of Code Case 2254 have been met?

Question 2:

Does the National Board Inspection Code Committee have any plans to adopt the ASME Code Case 2254 and revise the requirements of NBIC Part 1 Section 2.9.5.1 (C) such that allowance would be made for the use of "Changeover" valves if the MAWP of the boiler was 800 psig or below and all of the conditions set forth in the ASME Code Case have been met?

Thank you for your consideration,

*Chuck Easterbrooks*

RE: Inquiry  
Easterbrooks, Chuck  
to:  
RHough  
11/25/2009 01:21 AM  
Show Details

History: This message has been forwarded.  
Mrs. Hough,

Sorry for the delay in the response. I hope this satisfies your request. If you have any questions or further clarifications need to be made, please let me know so that I may assist

Question 1:

Is a Changeover valve as specified in ASME Code Case 2254 allowed for use between the boiler and the required safety relief valve if all of the conditions of Code Case 2254 have been met?

Answer: Yes

Justification: 2008 NBIC Part 1, Section 2, 2.9.5.1 (c) states "No valve of any description should be placed between the safety or safety relief valves and the boiler" and as defined in the Introduction of the Code: "Should – indicates a preferred but not mandatory means to accomplish the requirement unless specified by others such as the Jurisdiction"

Question 2:

Does the National Board Inspection Code Committee have any plans to adopt the ASME Code Case 2254 and revise the requirements of NBIC Part 1 Section 2.9.5.1 (C) such that allowance would be made for the use of "Changeover" valves if the MAWP of the boiler was 800 psig or below and all of the conditions set forth in the ASME Code Case have been met?

Answer: Yes

Justification: The Committee (NBIC), while remaining consistent with the intended purpose of the Code as outlined in the Forward "It is organized for the purpose of promoting greater safety to life and property by securing concerted action and maintaining uniformity in post-construction activities of pressure-retaining items, thereby ensuring acceptance and interchangeability among jurisdictional authorities responsible for the administration and enforcement of various codes and standards" and "The general philosophy underlying the NBIC is to parallel those provisions of the original code of construction, as they can be applied to post-construction activities", recognizes that certain NBIC States (i.e. California) have accepted the use of "Changeover" valves as specified in ASME Code Case 2254 or they have written into their States Boiler Laws (multiple States) to adopt the latest ASME Code Cases and that the Code Case will allow an owner, operator, or owner-operator the ability to switch out a malfunctioning safety or safety relief valve without a complete boiler shutdown and system depressure while maintaining the uninterrupted safety relief protection, thus increasing the safe reliability of the boiler while decreasing the risk to personnel and property associated with shutdown and start-up operations.

## **Chuck Easterbrooks**

QA/QC Supervisor  
Hess Corp.  
Seminole, TX  
(432) 758-8649 office  
(432) 209-1086 cell

**Attachment 3**

Attachment 3

COMMITTEE: National Board Inspection Code  
Subcommittee on Pressure Relief Devices

ADDRESS WRITER CARE OF:  
Farris Engineering  
Curtiss Wright Flow Control Corp.  
10195 Brecksville Road  
Brecksville, Ohio 44141  
Phone: 440-838-5090  
Fax: 440-838-5194  
Email: Tpatel@Curtisswright.com

To: Marianne Brodeur (TG Chair)  
Kevin Simmons  
Thakor Patel  
Brandon Nutter  
Ray McCaffery  
Alton Cox  
Ali Syed  
Joe Ball SC-PRD Secretary  
Frank Hart, SC-PRD Chairman

*2- N66 of We  
1- NOT VOTING*

July, 22nd, 2009

Subject: NB06-0101, Source of Specification for replacement parts

EXISTING Part 3, S7.5 a)

PROPOSED REVISION TO Part 3, S7.5, a)

(a) All Critical parts shall be fabricated by the Valve manufacturer or to the Manufacturer's specifications.

All replacement critical parts shall be fabricated by the original valve manufacturer under its current ASME Quality System or to specifications of the original valve manufacturer. The specifications shall include all technical data required to produce the part.

Critical parts are those that may affect the Valve flow passage, capacity function, or Pressure retaining integrity.

The replacement critical part fabricator other than the original valve manufacturer shall have and provide evidence of:

(b) All critical parts not fabricated by the valve Manufacturer shall be supplied with material test certification for the material used to fabricate the part.

- a. An industry recognized Quality System equivalent to ASME
- b. The applicable revision of the technical data from the original Valve Manufacturer to produce the specific part.

These requirements do not apply to parts and components that are normally purchased by the manufacturer from an outside vendor and are considered hardware items built to existing industry standards or specifications, provided the parts comply with the original valve manufacturer's material and design requirements. The hardware items include, but not limited to studs, nuts, screws, 'o' rings, washers, and fittings.

(c) Replacement critical parts receiving records Shall be attached or be traceable to the valve Repair document.(See S7.3(a)). These records Shall conform to at least one of the following.

*1*

## Negative votes for NB06-0101

1. Reason for Disapproval- I believe replacement parts of PRV's shall meet the requirements as in the original code of construction as do all other repairs in the NBIC. To allow not certified parts to be used would be a risk to public safety.

Gary Scribner

2. I felt the proposed change would created additional hardships on both Owners of PRD's and VR shops that repair PRD's. From the Owner / User perspective it is already difficult to get replacement PRD parts in a timely manner; adding the new sections and the word "original " to Part 3 S7.5, potentially would make replacement parts difficult if not impossible to obtain, and may force owners to completely replace PRD's at the scheduled maintenance intervals. I recommend the existing language in Part 3 - S7 remain as is.

Steve Bacon

3. The proposed revisions to Part 3, S7.5(a) and (b) would unfairly limit the selection of potential valve part suppliers to original manufacturers or those with close relationships to only those manufacturers. In addition, the proposed changes do not add any element of safety to the public in my opinion. The existing words appear to be sufficient to assure capable manufacturers are selected for making the PRD parts.

Ron Pulliam

4. I voted "abstain" on item NB06-0101 during the meeting bur am now changing my vote to negative in support of and in agreement with Alton Cox, Marianne Brodeur and Sidney Cammeresi.

David Parrish

## Abstention votes on NB06-0101

1. I did not have sufficient information to adequately consider this item. From what I can see, however, we may be changing a longstanding safety issue if this item proceeds. Critical parts should only come from the manufacturer.

Bob Reetz

2. I abstained from voting because I didn't feel confident that I understood the proposed changes and the impact the changes would have on critical replacement parts for valves.

Jim Pillow

3. I would like to know how the non-O.E.M part manufacturer can properly design and fabricate the part for the Safety Relief Device and guarantee original design performance.

James Yagen

4. Voted abstain because I don't understand all the implications.

Craig Hopkins

5. Did not understand the item.

Jack Given

6. How does Man. concern fabricate a part for the valve without having the specification or drawing criteria.

Ray Snyder

7. I abstained on this for lack of information and a feeling that proprietary issues might be best handled as staff function with access to consul. I don't understand whether an adopted code can or should give an edge to an original manufacturer over a replacement parts manufacturer.

Allan Platt

**COMMITTEE:** National Board Inspection Code  
Subgroup Pressure Relief Devices

**ADDRESS WRITER CARE OF:**  
Industrial Valve Sales & Service, Inc.  
P.O. Box 1468  
Mobile, AL 36633-1468  
Phone: (251)675-5282  
Fax: (251)679-5018  
E-mail: scox@indvalve.com

**TO:** Denis DeMichael, DuPont  
Thakor Patel, Farris  
Kevin Simmons, Tyco  
Kevin Fitzsimmons, Cater Chambers  
Joe Ball, SG-PRD Secretary  
Frank Hart, SG-PRD Chairman

**DATE:** January 13, 2008

**SUBJECT:** New Business NB07- 1301 – QC System for Replacement Critical Parts

**BACKGROUND / RATIONALE:** This item is intended to address discussions regarding replacement critical part fabrication by the Original PRV Manufacturer. A "VR" Certificate Holder's Quality System must include a method of determining that parts received from the Original PRV Manufacturer meet the Original PRV Manufacturer's specifications. Consider the following:

- 1) A provision should be added to require OEMs to provide Replacement Critical Parts equivalent to a ASME Program Parts.
- 2) Parts Identification – Allows VR Holder to identify part for appropriate repair instructions:
  - 1) OEM Parts marking is a new concept. TO needs to consider.
    - a. Manufacturer's identification symbol
    - b. Manufacturer's Part Number
    - c. Material Marking – Type and Traceability
      - i. May be coded
    - d. Hydrostatic Testing Mark (where applicable)

OEM must hold current ASME Certification for the PRV Design in order to furnish Replacement Critical Parts. Otherwise, how does VR Holder know parts meet the requirements of the OEM ASME accepted program?

If the OEM does not hold current ASME Certification, the OEM must furnish a C of C with the part(s) and MTRs, etc.

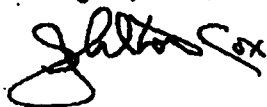
**NOTE:** RA-2255, i. *Repair and Inspection Program (Second Sentence)*

Repair procedures shall require verification that the critical parts meet the valve manufacturer's specification.

I have included a proposed revision to RE-1050 for your consideration.

Thank you for your consideration of this matter. I look forward to discussing this item.

Best Regards,



J. Alton Cox

1/2

4

PART 3, 57.5  
EXISTING RE-1050.

RE-1050-

*the manufacturers*  
All critical parts shall be fabricated by the valve manufacturer or to his specifications. Critical parts are those that may affect the valve flow passage, capacity function, or pressure-retaining integrity.

All critical parts not fabricated by the valve manufacturer shall be supplied with material test certification for the material used to fabricate the part.

Replacement critical parts receiving records shall be attached or be traceable to the valve repair document (see RA-2255 (1)). These records shall conform to at least one of the following.

- a. Receiving records documenting the shipping origin of the part fabricated by the valve manufacturer (such as packing list) from the valve manufacturer or assembler of the valve type.
- b. A document prepared by the "VR" Certificate holder certifying that the replacement part used in the repair has the manufacturer's identification on the part or is otherwise labeled or tagged by the manufacturer and meets the manufacturer's acceptance criteria (e.g. critical dimensions found in maintenance manual).
- c. Receiving records for replacement critical parts obtained from a source other than the valve manufacturer or assembler of the valve type shall include a certificate of compliance that provides as a minimum:
  1. The part manufacturer and part designation.
  2. A certifying statement that either:
    - a. The part was fabricated by the valve manufacturer and meets the manufacturer's acceptance criteria (e.g. critical dimensions found in maintenance manual), or
    - b. The part meets the manufacturer's specifications and was fabricated from material as identified by the attached material test report
  3. The signature of an authorized individual of the part source, and
  4. The name and address of the part source for whom the authorized individual is signing.

Material for bolting shall meet the manufacturer's specification, but does not require material test certification if marked as required by the material specification.

PART 3  
PROPOSED REVISION TO RE-1050  
57.5 a)

All replacement critical parts furnished by the original valve manufacturer shall be fabricated in accordance with the original valve manufacturer's ASME accepted Quality System.

Replacement critical parts shall be marked/tagged with:

- a. Manufacturer's identification symbol
- b. Manufacturer's Part Number
- c. Material Marking - Type and Traceability (may be coded)
- d. Hydrostatic Testing Marking (as applicable)

The valve manufacturer shall hold current ASME Certification for the PRV Design in order to furnish replacement critical parts.

If the valve manufacturer or assembler does not hold current ASME Certification, the valve manufacturer shall furnish a Certificate of Compliance with the part(s) and material test reports (refer to section c. below).

2/2

5