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THE
NATIONAL
BOARD
OF BOILER AND
PRESSURE VESSEL
INSPECTORS

NATIONAL BOARD SUBCOMMITTEE ON PRESSURE RELIEF DEVICES

MINUTES

Meeting of July 18, 2012
Columbus Ohio

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The National Board of Boiler & Pressure Vessel Inspectors
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COMMITTEE CORRESPONDENCE

1. **CALL TO ORDER**

The meeting was called to order at 8:00 AM on Wednesday July 18, 2012 by Vice Chair J. Alton Cox.

The following members and visitors were in attendance:

Members

J. Alton Cox
Marrienne Brodeur
Thakor Patel
Sid Cammeresi
Denis DeMichael
Kevin Simmons
Robert "Buddy" Dobbins
Benjamin Anthony
Raymond McCaffrey
Joseph F. Ball

Affiliation

JAC Consulting, Inc.
International Valve & Instrument Corp.
Farris Engineering
Furmanite America
DuPont
Anderson Greenwood Crosby
Zurich N.A.
State of Rhode Island
Quality Valve, Inc.
National Board (Subcommittee Secretary)

Members Not Present

Frank Hart
R.W. Donalson

Furmanite Worldwide
Tyco Valves & Controls

Visitors

Thomas P. Beirne
Kim Beise
David McHugh
Thomas White
Adam Renaldo

National Board
Dowco Valve Co., Inc.
Allied Valve, Inc.
NRG Energy
Praxair, Inc.

2. **ANNOUNCEMENTS**

Mr. Ball announced the reception for Wednesday evening and that Mr. Beirne will be assisting in secretarial duties.

3. **ADOPTION OF THE AGENDA**

The agenda dated June 20, 2012 was presented. Mr. Cox requested that a new interpretation be added to address the use of the new ASME certification mark. Mr. Ball requested that NB12-0603 be added. There was a motion to approve the agenda with the two additional items. The motion was unanimously approved.

4. **REVIEW OF THE MINUTES**

There was a motion to approve the minutes of the January 2012 meeting of the Subcommittee on Pressure Relief Devices. The motion was approved with seven affirmative votes and one abstention (Mr. DeMichael since he was not at the previous meeting)

5. **REVIEW OF THE ROSTER**

It was noted that Ms. Brodeur's, Mr. Cammeresi's, Mr. Hart's, and Mr. Donalson's memberships were up for renewal on 8/31/12. All members who were up for renewal were interested in continuing their membership. Mr. Simmons asked the committee if the mix of interests was acceptable. Mr. Cox mentioned he would like to see another user on the subcommittee.

6. **INTERPRETATIONS**

IN12-0301 A Part 2, 2.5.8 Q: The table suggested inspection and test frequencies in 2.5.8 f) does not include a column for "test frequency". Is the suggested test frequency the same as the suggested inspection frequency? Proposed reply: Yes

After discussion the subcommittee reworded the question to the following: The table suggested inspection and test frequencies in 2.5.8 f) does not include a column for "test frequency". Should the column heading include inspection AND testing?

There was a motion to reply yes to the subcommittee's reworded question. The motion was unanimously approved.

The rationale was that "inspection and testing" are used together in preceding and subsequent paragraphs.

IN12-0301 B Part 2, 2.5.8 Q: When test records and/or inspection histories are available, can the guidelines in 2.5.8(g) be used to establish inspection and test frequencies, even if a suggested frequency given in the table in 2.5.8 (f)? Proposed reply: Yes

After discussion the subcommittee reworded the questions to the following: May the guidelines for establishing the inspection and testing frequencies listed in 2.5.8(g) apply to the services listed in 2.5.8(f)?

There was a motion to reply yes to the subcommittee's reworded question. The motion was unanimously approved.

The rationale was that all of those items in 2.5.8(f) are recommendations.

IN12-0301 C Part 2, 2.5.8 Q: For relief devices on a pressure vessel in clean dry gas service, if testing records are available, and testing frequency been established in accordance with 2.5.8(g) may the interval between relief device tests exceed 5 years? Proposed reply: Yes

After discussion there was a motion to close the inquiry with no action based on the reply to IN12-0301B and inform the inquirer. The motion was unanimously approved.

IN12-0301 D Part 2, 2.5.8 Q: For relief devices on a pressure vessel in clean dry gas service, if testing records are available, and testing frequency been established in accordance with 2.5.8(g) may the interval between inspections be different than the interval between tests. For example, in clean dry gas service, would it be acceptable if the relief devices were inspected every 2 years, but tested every 6 years? Proposed reply: Yes

After discussion the inquirer withdrew the question.

IN12-0301 E Part 2, 2.5.8 Q: Once an acceptable relief device test interval has been established per 2.5.8(g) is it acceptable to replace the relief device with new devices, of the same make and design, at the established test frequency in lieu of testing the relief devices? For example in clean dry gas service would it be acceptable if the relief devices were inspected every 2 years and replaced every 6 years in lieu of functional testing, with a random sample of replaced devices being bench tested to confirm that the 6-year interval is still acceptable? Proposed reply: Yes

After discussion the subcommittee reworded the question to the following: Once an acceptable pressure relief device service interval has been established per 2.5.8(h), is it acceptable to replace the pressure relief device at the established service interval in lieu of servicing?

There was a motion to reply yes to the subcommittee's reworded question. The motion was approved with six affirmative votes and two abstentions (Mr. Simmons, Mr. DeMichael).

The rationale was that 2.5.8(h)1 permits replacement and 2.5.8(h)3 limits servicing to 3 inspection intervals.

See attachments A1 through A6

7. PUBLIC REVIEW COMMENTS

There were no public review comments for this meeting.

8. ACTION ITEMS

NB11-0401 Proposed Part 4, Pressure Relief Document

The Chair reported the proposed document had been discussed at the executive committee meeting where it was recommended it be tabled at this time due to comments received during the informational ballot. To better determine industry needs, it was asked of the subcommittee to develop questions for an industry survey to determine if it would be favorable to the users of the proposed Part 4 if it were in fact broken out. After discussion of possible questions it was decided to submit no more than 5 questions for a survey in approximately two weeks.

NB12-0901 Part 3, Prepare guide for repair of tank vents

After discussion it was decided to start with a guide for pallet weighted tank vents and follow with spring loaded and low pressure pilots in future editions. The task group will have an outline/table of contents ready for the January 2013 meeting for review and comment with a draft document possibly ready for the July 2013 meeting.

NB12-1701 Part 2, Manufacturer Information Notices

There was a suggestion to make mandatory for manufacturers to make it public to all assemblers and VR stamp holders if there is a problem with their valves in an email received from Mr. Tanis of North American Safety Valve to J. Ball. After review of the email and discussion, the subcommittee agreed that it was outside the NBIC's scope. There was a motion to take no action and have a letter sent to the inquirer informing him of the subcommittee's response. The motion was passed with 7 affirmative votes and 1 abstention (Mr. Simmons).

See attachments A8 and A9

9. NEW BUSINESS

NB12-0603 Part 3 Removal of administrative requirements

This item was added for information since it includes potential changes to the VR program. A draft was reviewed and discussed. A letter ballot will be distributed on the item.

IN13-0101 Part 3 1.7.3, 1.7.5, S7.2 A new interpretation was requested by Mr. Cox to address VR repairs of valves which will soon bear the new ASME Certification Mark and Designator. The following question and reply was developed by the subcommittee.

Q: May the VR stamp be applied to pressure relief valves bearing the ASME Certification mark with the V, UV, HV, or NV designator?

There was a motion to reply yes to the question as worded. The motion was unanimously approved.

The rational was that the certification mark with designator is equivalent to existing V, UV, HV, and NV, stamps. See attachment A7

10. FUTURE MEETINGS

The next NBIC committee and subcommittee meetings will be held in Mobile, AL during the week of January 14, 2013. The subcommittee meeting will be on January 16, 2013.

July 2013 Columbus, OH

11. ADJOURNMENT

The meeting adjourned at approximately 3:30 PM.

Prepared by Thomas P. Beirne, P.E.

Respectfully Submitted,

Joseph F. Ball, P.E.
Secretary, NBIC Subcommittee Pressure Relief Devices

pc: D. Douin
 T. Parks
 R. Hough

Technical Inquiry for NBIC, 2011 Edition, Part 2, Section 2.5.8

Purpose: Requests for Interpretation

Inquirer: Adam M. Renaldo, PE

Address: Praxair, Inc., 175 East Park Dr, Building 1, Rm 110, Tonawanda, NY 14150

Telephone: 716-879-2928

Fax: 866-710-0972

Email: Adam_Renaldo@Praxair.com

Subject: NBIC, 2011 Edition, Part 2, Section 2.5.8

Question 1: The table of suggested inspection and test frequencies in 2.5.8 (f) does not include a column for "Test Frequency." Is the suggested test frequency the same as the suggested inspection frequency?

Proposed Reply: Yes

Question 2: When test records and/or inspection histories are available, can the guidelines in 2.5.8 (g) be used to establish inspection and test frequencies, even if a suggested frequency is given in the table in 2.5.8 (f)?

Proposed Reply: Yes

Question 3: For relief devices on a pressure vessel in clean dry gas service, if testing records are available, and a testing frequency is established in accordance with 2.5.8 (g), may the interval between relief device tests exceed 5 years?

Proposed Reply: Yes

Question 4: For relief devices on a pressure vessel in clean dry gas service, if testing records and inspection histories are available, and a testing frequency is established in accordance with 2.5.8 (g), may the interval between inspections be different than the interval between tests. For example, in clean dry gas service, would it be acceptable if the relief devices were inspected every 2 years, but tested every 6 years?

Proposed Reply: Yes

Question 5: Once an acceptable relief device test interval has been established per 2.5.8 (g), is it acceptable to replace the relief devices with new devices, of the same make and design, at the established test frequency, in lieu of testing the relief devices? For example, in clean dry gas service, would it be acceptable if the relief devices were inspected every 2 years, and replaced every 6 years in lieu of functional testing, with a random sample of replaced devices being bench tested to confirm that the 6-year interval is still acceptable?

Proposed Reply: Yes

AI Pg. 1/2

Background:

Excerpt from NBIC, 2011 Edition, Part 2, Section 2.5.8

f) Pressure Vessels and Piping

Frequency of test and inspection of pressure relief devices for pressure vessel and piping service is greatly dependent on the nature of the contents and operation of the system and only general recommendations can be given. Inspection frequency should be based on previous inspection history. If valves are found to be defective or damaged by system contents during inspection, intervals should be shortened until acceptable inspection results are obtained. Where test records and/or inspection history are not available, the following inspection and test frequencies are suggested:

Service	Inspection Frequency
Steam	Annual
Air and Clean Dry Gases	Every three years
Pressure relief valves in combination with rupture disks	Every five years
Propane, Refrigerant	Every five years
All Others	Per inspection history

g) Establishment of Inspection and Test Intervals

Where a recommended test frequency is not listed, the valve user and Inspector must determine and agree on a suitable interval for inspection and test. Some items to be considered in making this determination are:

- 1) Jurisdictional requirements;
- 2) Records of test data and inspections from similar processes and similar devices in operation at that facility;
- 3) Recommendations from the device manufacturer...

A1 Pg. 2/2

PROPOSED INTERPRETATION

Inquiry No.	IN12-0301 A				
Source	Adam Renaldo				
Subject	Part 2, 2.5.8				
Edition	2011 Edition				
Question	The table of suggested inspection and test frequencies in 2.5.8 (f) does not include a column for "test frequency". Is the suggested test frequency the same as the suggested inspection frequency?				
Reply	Yes				
Committee's Question	The table of suggested inspection and test frequencies in 2.5.8 (f) does not include a column for "test frequency. Does the column heading "Inspection Frequency" include Inspection and Testing"?				
Committee's Reply	Yes				
Rationale	Paragraphs 2.5.8 f) and 2.5.8 g) indicates this information applies to inspection and test frequencies.				
SC Vote	Unanimous X	No. Affirmative	No. Negative	No. Abstain	No. Not Voting
NBIC Vote	Unanimous	No. Affirmative	No. Negative	No. Abstain	No. Not Voting
Negative Vote Comments					

PROPOSED INTERPRETATION

Inquiry No.	IN12-0301 B				
Source	Adam Renaldo				
Subject	Part 2, 2.5.8				
Edition	2011 Edition				
Question	When test records and/or inspection histories are available, can the guidelines in 2.5.8 (g) be used to establish inspection and test frequencies, even if a suggested frequency is given in the table in 2.5.8 (f)?				
Reply	Yes				
Committee's Question	May the guidelines for establishing inspection and test frequencies in 2.5.8 g) be used for establishing the frequencies of inspection and test for fluids in the table in 2.5.8 f)?				
Committee's Reply	Yes				
Rationale	2.5.8 indicates this information is "recommended" therefore the guidelines can be used.				
SC Vote	Unanimous X	No. Affirmative	No. Negative	No. Abstain	No. Not Voting
NBIC Vote	Unanimous	No. Affirmative	No. Negative	No. Abstain	No. Not Voting
Negative Vote Comments					

PROPOSED INTERPRETATION

Inquiry No.	IN12-0301 C				
Source	Adam Renaldo				
Subject	Part 2, 2.5.8 g)				
Edition	2011 Edition				
Question	For relief devices on a pressure vessel in clean dry gas service, if testing records are available, and a testing frequency is established in accordance with 2.5.8 g) may the interval between relief device tests exceed 5 years?				
Reply	Yes				
Committee's Question	See below				
Committee's Reply					
Rationale					
SC Vote	Unanimous X	No. Affirmative	No. Negative	No. Abstain	No. Not Voting
NBIC Vote	Unanimous	No. Affirmative	No. Negative	No. Abstain	No. Not Voting
Negative Vote Comments	Move and seconded to close with ~~no~~ action. Previous IN12-0301B also addresses this item. Committee to advise inquirer. Action passes unanimously.				

PROPOSED INTERPRETATION

Inquiry No.	IN12-0301 D				
Source	Adam Renaldo				
Subject	Part 2, 2.5.8				
Edition	2011 Edition				
Question	Proposed question: For relief devices on a pressure vessel in clean dry gas service, if testing records and inspection histories are available, and a testing frequency is established in accordance with 2.5.8 g), may the interval between inspections be different than the interval between inspections be different than the interval between tests. For example, in clean dry gas service, would it be acceptable if the relief devices were inspected every 2 years, but tested every 6 years?				
Reply	Yes				
Committee's Question					
Committee's Reply					
Rationale					
SC Vote	Unanimous	No. Affirmative	No. Negative	No. Abstain	No. Not Voting
NBIC Vote	Unanimous	No. Affirmative	No. Negative	No. Abstain	No. Not Voting
Negative Vote Comments	Comment: Questions was withdrawn by the inquirer.				

PROPOSED INTERPRETATION

Inquiry No.	IN12-0301 E				
Source	Adam Renaldo				
Subject	Part 2, 2.5.8				
Edition	2011 Edition				
Question	Proposed question: Once an acceptable relief device test interval has been established per 2.5.8 g) is it acceptable to replace the relief devices with new devices of the same make and design, at the established test frequency, in lieu of testing the relief devices? For example, in clean dry gas service, would it be acceptable if the relief devices were inspected every 2 years, and replaced every 6 years in lieu of functional testing, with a random sample of replaced devices being bench tested to confirm that the 6 year interval is still acceptable?				
Reply	Yes				
Committee's Question	Once an acceptable pressure relief device service interval has been established per 2.5.8 h) is it acceptable to replace the pressure relief devices with a new device at the established service interval in lieu of servicing?				
Committee's Reply	Yes				
Rationale	2.5.8 h)1) permits replacement of PRV's and 2.5.8 h) limits the interval to less than 3 inspection intervals.				
SC Vote	Unanimous	No. Affirmative 6	No. Negative	No. Abstain 2	No. Not Voting
NBIC Vote	Unanimous	No. Affirmative	No. Negative	No. Abstain	No. Not Voting
Negative Vote Comments					

PROPOSED INTERPRETATION

Inquiry No.	IN13-0101				
Source	Alton Cox				
Subject	Part 3, Par. 1.7				
Edition	2011				
Question	May the VR stamp be applied to pressure relief valves bearing the ASME Certification mark with the V, HV, UV, or NV designator?				
Reply	Yes				
Committee's Question	same				
Committee's Reply					
Rationale	The new ASME Certification mark with the appropriate Designator is equivalent to the existing V, UV, HV or NV stamps.				
SC Vote	Unanimous X	No. Affirmative	No. Negative	No. Abstain	No. Not Voting
NBIC Vote	Unanimous	No. Affirmative	No. Negative	No. Abstain	No. Not Voting
Negative Vote Comments					

NB12-1701

NBIC action item request

Joe Ball to: Allen

Cc: "Bruce", obrienc, Robin Hough

02/22/2012 04:46 PM

Dear Mr. Tannis,

By copy of your note below I am forwarding this item to Robin Hough who coordinates the secretarial duties of the NBIC committee with a request that an action item number be assigned to your request below.

However I will also give you my personal comment that it may be difficult for the NBIC Committee to address an item such as this request. The National Board does not have any regulatory enforcement authority over the actions of valve manufacturers for post construction activities. The certificate holders in the National Board VR program are the regulated entities where enforcement actions can be taken. In the new construction area, it may also be difficult to write Code rules to address this kind of topic, because after the valve goes into service, as long as the valve manufacturer has followed their accepted quality program, the effects of environmental or service related problems is not directly a new construction issue that the ASME Code can regulate.

Please note that NBIC Part 2 gives requirements for periodic inspection and testing of in-service pressure relief devices where potential problems would hopefully be uncovered and addressed by valve repair or replacement.

Please call or write with any questions or concerns.

Sincerely,

Joseph F. Ball, P. E.
Director, Pressure Relief Department

National Board Testing Laboratory
7437 Pingue Drive
Worthington OH 43085

National Board Main Phone: 614-888-8320
Direct line phone no.: 614-431-3209
Jball@nationalboard.org
<http://www.nationalboard.org>
Fax: 614-848-3474

"Allen"

02/20/2012 01:51:50 PM

From: "Allen" <Allen@nasvi.com>
To: <jball@nationalboard.org>
Cc: <obrienc@asme.org>, "Bruce" <Bruce@nasvi.com>
Date: 02/20/2012 01:51 PM
Subject: FW:

I would like both the VR committee and the ASME SC-SVR to make it mandatory for manufacturers to make it public to all assemblers and VR stamp holders if there is a problem with their valves. Whether it be, and not limited to, recalls and service bulletins.

A8 pg. 1/2

PRD

A very large example is attached to this email. It is imperative that everyone in the "safety valve world" know about things like this.

I would like the committees to take this request under advisement and move as quickly as possible before something bad happens.

Sincerely yours,

Allen Tanis
President

North American Safety Valve
1500 Iron Street
North Kansas City, MO 64116

1-800-806-8682 Phone
1-816-421-0297 Fax

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THE
NATIONAL
BOARD

OF BOILER AND
PRESSURE VESSEL
INSPECTORS

June 30, 2012

Mr. Allen Tannis
North American Safety Valve
1500 iron Street
North Kansas City MO 64116

Dear Mr. Tannis:

The National Board Inspection Code Committee and its Sub Committee on Pressure Relief Devices reviewed your request contained in your e-mail of February 20, 2012 at its meetings during the week of July 16, 2012. The NBIC Committee appreciates your concerns and understands the criticality of the issue. As a group including Manufacturers, Repair stamp holders, Jurisdictions, Insurance, Users and General Interest members, we agree that publicized information of valve problems would be ideal. However, this issue is beyond the scope of the National Board Inspection Code because it concerns organizations not controlled or regulated by the National Board.

Thank you for your concern on this issue.

Sincerely,

Robin Hough
Secretary, NBIC Committee
: rmh

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