

NATIONAL BOARD INSPECTION CODE SUBCOMMITTEE REPAIRS & ALTERATIONS

MINUTES

Meeting of July 13, 2022 Indianapolis, IN

These minutes are subject to approval and are for the committee use only. They are not to be duplicated or quoted for other than committee use.

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

Chair Kathy Moore called the meeting to order at 8:00am Eastern Time in the Alexander Ballroom on the second floor of the hotel.

2. Roll call of Members and introduction of Visitors

Secretary Hellman called roll of the Members and held introductions of visitors

3. Check for a Quorum

Secretary Hellman verified a quorum was reached. (Attachment 1)

4. Announcements

- The National Board will be hosting a reception on Wednesday evening from 6:30pm to 8:30pm in City Way Gallery.
- The National Board will be hosting breakfast and lunch on Thursday. Breakfast will be served from 7:00am to 8:00am, and lunch will be served from 11:30am to 12:30pm. Both meals will be served at the hotel in Market Table.
- This meeting is the last at which items can be approved for inclusion in the 2023 NBIC edition.

5. Adoption of the Agenda

- **a.** The following revisions have been made to the Agenda:
 - i. Revised A20-83
 - ii. Revised A21-12
 - iii. Updated A21-45
 - iv. Revised A22-04
 - v. Revised A22-05
 - vi. Added A22-18
 - vii. Added A22-19
 - viii. Added A22-21
 - ix. Added A22-23
 - **x.** Revised Mr. Derby's TG consideration
- **b.** The agenda was unanimously accepted, as revised.

6. Approval of the Minutes of the January 19th, 2022 Meeting

The minutes from the January 2022 meeting can be found on the Committee Information page under the Inspection Code tab on the National Board's website.

7. Review of Rosters

a. Membership Nominations

- i. Mr. Philp Gilston would like to be reconsidered for Subcommittee membership. He recently changed employers, which changed his interest category from Manufacturers to Authorized Inspection Agencies.
- **ii.** Mr. Robert (Bob) Derby would like to be considered for INTERP Task Group membership.
- **iii.** Mr. Eben Creaser, Caslav Dinic, would like to be considered for Task Group NR membership.

b. All Members UA

c. Membership Reappointments

- i. The following Subgroup R&A memberships will expire prior to the January 2023 NBIC meeting: Mr. Tim McBee and Mr. Bob Underwood.
- ii. The following Subcommittee R&A memberships will expire prior to the January 2023 NBIC meeting: Ms. Pat Becker, Mr. Tim McBee, Mr. Ray Miletti, Mr. Michael Quisenberry, Mr. Paul Shanks, and Mr. John Siefert.
- iii. All members UA

d. Officer Nominations

- e. Resignations
- f. Presentation By Aaron Viet

8. Interpretations

(INTENT INTEP 120-78 REQUIRES A22-21 APPROVAL FIRST)

Item Number: A22-21 NBIC Location: Part 3, 3.4.4 d)

Attachment 2

General Description: Example of Alteration

Subgroup: Repairs and Alterations

Task Group: B. Underwood (PM).

Explanation of Need: A change in dimension of a pressure retaining item is not considered an alteration in many cases (increasing nozzle/tube thickness, increasing nozzle diameter in some cases...). This revision would provide clarity that only a change in dimension that decreases its pressure retaining capability be considered an alteration.

SG R&A July 2022 Meeting Action: B. Underwood presented. This is related to Intent Interp I20-78. Conversations held that I21-12 may need to be resolved before this item can be voted on, but due to this being the last meeting for inclusion into the 2023 Edition, this proposal was motioned for a vote. **The proposal was UA.**

SC R&A July 2022 Meeting Action: B. Underwood presented. This is related to Intent Interp I20-78. This proposal was discussed and examples of repairs vs alterations were explained to not be an inclusive list. **The proposal was UA.**

Item Number: I20-78 NBIC Location: Part 3, 3.3.3 s) & 3.4.4 d) Attachment 3

General Description: Repairs and Alterations of Tube Bundles

Subgroup: Repairs and Alterations

Task Group: Paul Shanks

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.)

January INT TG 2022 Meeting Action: P. Shanks presented that this is still being held back. **Progress Report** till 21-12 is resolved.

SC R&A January 2022 Meeting Action: P. Shanks presented that this is still being held back. **Progress** Report till 21-12 is resolved.

INT TG July 2022 Meeting Action: A new Action Item will be submitted to address this item. This will be an Intent Interp once the new Action Item is approved. **This is a PR.**

SG R&A July 2022 Meeting Action: P. Shanks presented. The proposal was revised to match the related A22-21 and was UA.

SC R&A July 2022 Meeting Action: P. Shanks presented. The proposal was UA.

Item Number: I21-39 NBIC Location: Part 3, 3.3.2 e) Attachment 4

General Description: Routine repair scope

Subgroup: Repairs and Alterations

Task Group: P. Shanks (PM), P. Gilston

Explanation of Need:

Some R-certificate holders and AIAs are making huge (100 square feet) weld metal buildup type routine repairs on the basis that the components being built up are only 5" tubes and 3.3.2 e) 1) says welded repairs to 5" tubes are routine. As 3.3.2 e) includes "shall be limited to" shouldn't exceeding any one of the listed limitations preclude the routine repair approach.

INT TG January 2022 Meeting Action: P. Shanks presented and issues with weld buildup vs corrosion resistance weld overlay and what is a routine repair to pipe < 5" per 3.3.2 e). The proposal was revised, and a Committee's question and answer were drafted. The proposal was Approved. M. Toth abstained.

SC R&A January 2022 Meeting Action: T. Sieme presented. The proposal was discussed. M. Toth commented on concerns with weld overlay and his reason for abstention in the SG level and adding "tubes" to the proposal and limits of how many could be repaired or replaced as a routine repair. The proposal was voted: The proposal was approved with 2 abstentions. M. Quisenberry and M. Toth.

MC January 2022 Meeting Action: P. Shanks will take back – PR

INT TG July 2022 Meeting Action: This will be addressed at SG tomorrow. This was a PR.

July SG R&A 2022 Meeting Action: P. Shanks presented a revised proposal. The proposal was IIA

July SC R&A 2022 Meeting Action: P. Shanks presented a revised proposal. The proposal was UA.

Item Number: NBIC Location: Part 3, No Attachment 121-60 3.4.5.1 b)

General Description: UDS requirements for repairs and alterations for Divisions 2 & 3

Subgroup: Repairs and Alterations

Task Group: G. Galanes (PM), B. Morelock

Explanation of Need:

Is it the intent of interpretation 19-14 to prohibit the R-Certificate holder from recreating a UDS while still allowing the user to create the UDS? If yes, could the R-Certificate holder serve as the user's designated agent to recreate the UDS? Although this interpretation applies specifically to alterations, would this interpretation also be applicable to performing repairs (see 3.3.5.2(a))?

INT TG January 2022 Meeting Action: G. Galanes presented. B. Morelock indicated that Division 3 requirements may have an impact on this item and will hold it back to make changes. This was a PR.

SC R&A January 2022 Meeting Action: T. Sieme presented a PR.

NOTE: IF A22-12 IS APPROVED, I21-60 CAN BE CLOSED W/NO ACTION

INT TG January 2022 Meeting Action: Closed w/No Action – UA (Inquirer has already been contacted)

SC R&A January 2022 Meeting Action: Closed w/No Action – UA (Inquirer has already been contacted)

Item Number: I21-75 NBIC Location: Part 3, 3.3.2 e) 1) Attachment 5

General Description: Routine Repairs

Subgroup: Repairs and Alterations

Task Group: C. Hopkins (PM), S. Frazier

Explanation of Need:

The wording "but does not include nozzles to pressure-retaining items" could lead into interpreting the nozzle as a whole including the joint attaching the nozzle to the PRI.

INT TG January 2022 Meeting Action: Neither Mr. Hopkins or Mr. Frazier were present to report on the item. This was a PR

SC R&A January 2022 Meeting Action: T. Seime presented a PR.

INT TG July 2022 Meeting Action: T. Sieme presented. The proposal was revised after discussion. The proposal was UA as revised.

SC R&A July 2022 Meeting Action: T. Sieme presented. The proposal was UA.

Item Number: I21-79 NBIC Location: Part 3, 3.3.3(h)(2) Attachment 6

General Description: Mechanical Replacement of Shell or Head

Subgroup: Repairs and Alterations

Task Group: B. Schaefer (PM), M. Quisenberry

Explanation of Need: This interpretation and corresponding Code revision (A21-80) would provide clarity to NBIC users and address whether mechanical replacement of these components is considered a repair.

INT TG January 2022 Meeting Action: M. Quisenberry presented a PR

January 2022 Meeting Action: M. Quisenberry presented a PR

MC January 2022 Meeting Action: Took Item A21-80, as it was related. B. Underwood

presented. PR

INT TG July 2022 Meeting Action: M. Quisenberry presented a PR

SC R&A July 2022 Meeting Action: B. Schaefer presented a PR

New Interpretation Requests:

Item Number: I22-14 NBIC Location: Part 3, 3.2.2 b) and c) Attachment 7

General Description: Overlaid Replacement Parts

Subgroup: Repairs and Alterations

Task Group: T. McBee (PM), M. Carlson, D. Kinney, M. Quisenberry, P. Gilston, J. Ferreira

Explanation of Need: Replacement parts that are documented using a Manufacturer's Partial Data report that have been inspected by an Authorized Inspector may still be supplied as a replacement part under paragraph 3.2.2 b) and therefore not require a Hydro test per Paragraph 3.2.2 e). Panels made from Overlaid tubes and for single overlaid tube Dutchman that contain only weld overlay, where the overlay is not considered to be pressure retaining when the overlay is not considered part of the strength of the boiler tube per ASME Section I PW-44. May be supplied as replacement parts under paragraph 3.2.2 b). The purpose of the overlay is to extend the life of boiler tubes in the waste to energy corrosive environment from external wear.

INT TG July 2022 Meeting Action: T. McBee presented. Additional members added to task group. **This was a PR.**

SC R&A July 2022 Meeting Action: T. McBee presented a PR.

9. Action Items

a. Task Group Graphite

NBIC Location: Part 3 No Attachment

General Description: Develop supplement for repairs and alterations based on international

Subgroup: Graphite

construction standards

Task Group: Greg Becherer (PM)

Item Number: NB15-2208

Meeting Action: No members of the Graphite Task Group were present to discuss the item. This was a **Progress Report**. If no members of the Graphite TG attend the next meeting, this Item will be Closed with No Action.

SC R&A January 2022 Meeting Action: No one was able to present. PR

Update from May 2022 Graphite Meeting: Mr. Becherer was not present to report on any work he has done for this item. Mr. Viet stated that he came up with a list of practical repairs to look at how many of those are covered in the NBIC. From there his goal will be to see if any new sketches are needed or if a new repair operation section needs to be added to the NBIC. In discussing the list with the group, they felt that inlay repairs could use an additional sketch to expand on the different situations in which that repair would be used. Mr. Viet will work on some preliminary sketches to present at the next meeting.

SC R&A July 2022 Action: A. Viet presented a PR

Item Number: A17-167 NBIC Location: Part 3, S3.2 d) No Attachment

General Description: Clarify repair inspection requirements for machined only graphite parts.

Subgroup: Graphite

Task Group: Aaron Viet (PM)

Meeting Action: No members of the Graphite Task Group were present to discuss the item. This was a **Progress Report**. If no members of the Graphite TG attend the next meeting, this Item will be Closed with No Action.

January 2022 Meeting Action: No one was able to present. PR

Update from May 2022 Graphite Meeting: The task group voted to close this item with no action, as they felt making a change to this paragraph was not necessary.

SC R&A July 2022 Action: A. Viet presented that this was Close w/No Action - UA

Item Number: A18-94 NBIC Location: Part 3, S3.2 f), h); Attachment 8 S3.4 a), b), c) etc.

General Description: G-mark Requirements for Various Repairs/Alteration to Graphite

Subgroup: Graphite

Task Group: C. Cary (PM)

SC R&A January 2022 Meeting Action: No one was able to present. PR

Update from May 2022 Graphite Meeting: The task group unanimously approved a proposal for this item, which will be presented during the Subcommittee meeting.

SC R&A July 2022 Action: A. Viet presented. The proposal was UA.

Item Number: A19-73 NBIC Location: Part 3, S3 No Attachment

General Description: Requirements for who can make hole plugging repairs on graphite blocks

Subgroup: Graphite

Task Group: C. Cary (PM), A. Viet, A. Stupica

Explanation of Need: Performing hole plugging repairs in graphite blocks is a common repair for graphite pressure vessels, but the NBIC currently has no formal requirements for this type of repair.

SC R&A January 2022 Meeting Action: No one was able to present. PR

Update from May 2022 Graphite Meeting: The task group will be reviewing the existing procedure for plugging holes in tubes to create a baseline procedure for plugging holes in graphite blocks.

SC R&A July 2022 Action: A. Viet presented a PR

Item Number: A19-74 NBIC Location: Part 3, S3.3 Attachment 9

General Description: Routine repair requirements for partial nozzle replacement

Subgroup: Graphite

Task Group: A. Stupica (PM), M. Bost

Explanation of Need: Currently only nozzle replacement is addressed as a routine repair. The group is planning on defining the types of partial nozzle replacements and repairs that could be defined as routine.

January 2022 Meeting Action: No one was able to present. PR

Update from May 2022 Graphite Meeting: The task group approved a proposal for this item, which will be presented during the Subcommittee meeting.

SC R&A July 2022 Action: A. Viet presented. After several questions from membership, the proposal was revised and UA

Item Number: A19-79 NBIC Location: Part 3, S3.5.4 h) Attachment 10

General Description: Re-word Part 3, S3.5.4 h) to clarify cementing procedure for plugs

Subgroup: Graphite

Task Group: A. Stupica (PM)

Explanation of Need: Existing language includes unnecessary steps and is clunky to read. Text will be reworded to clarify the full procedure.

reworded to clarify the full procedure.

January 2022 Meeting Action: No one was able to present. PR

Update from May 2022 Graphite Meeting: The task group approved a proposal for this item, which will be presented during the Subcommittee meeting.

SC R&A July 2022 Action: A. Viet presented. The proposal was revised and UA.

b. Task Group FRP

There are currently no open FRP items related to Part 3.

c. Task Group Historical

Item Number: A20-25 NBIC Location: Part 3, S2.13 No Attachment

General Description: Repair Procedure for Fire Boxes

Subgroup: SG Historical

Task Group: M. Wahl (PM), Robin Forbes, T. Dillon, & F. Johnson

Explanation of Need: In NBIC Part 3, S2.13.10.3, S2.13.11 do not define what to do at a riveted joint. On the tubesheet, or firedoor sheet, where it is flanged to rivet to the firebox, the repairs are silent on what to do at the riveted joint.

SG Historical Jan Meeting Action: TG will be working more on this item now that a corresponding item form Locomotive has passed through MC. This is a PR.

SC R&A January 2022 Meeting Action: T. Seime presented a PR. 21-09

SG Historical July Meeting Action: PROGRESS REPORT: Mr. Dillon spoke on this item stating they were still waiting on locomotive on this item. He said locomotive were close or had passed something and then they would refer to it or add it to the Historical section of NBIC Part 3.

SC R&A July 2022 Meeting Action: T. Seime presented a PR

Item Number: A21-09 NBIC Location: Part 3, S2 No Attachment

General Description: Incorporate new repair methods for through and diagonal stays

Subgroup: SG Historical

Task Group: D. Rose (PM), R. Bryce, R. Forbes, C. Jowett

Explanation of Need: The code is silent on the inspection of through stays and diagonal stays. Additionally new repair methods are available from ASME that can be incorporated.

SG Historical Jan Meeting Action: Progress Report: Item being sent to Historical SG for Rvw and Comment LB.

SC R&A January 2022 Meeting Action: T. Seime presented a PR.

SG Historical july Meeting Action: PROGRESS REPORT: Mr. Rose spoke on this item. He has gone through he comments form he LB and has incorporated many of the comments and is still working on a proposal.

SC R&A July 2022 Meeting Action: T. Seime presented a PR

Item Number: A21-78 NBIC Location: Part 3, S2, No Attachment

S2.13.9.5

General Description: Alternative Weld Joint For Historical Boiler Barrel Replacement

Subgroup: SG Historical

Task Group: B. R. Underwood (PM), C. Jowett, F. Johnson, T. Dillon, M. Wahl, R. Bryce

Explanation of Need: This proposal would introduce double welded lap joint connections of the barrel to wrapper sheet in lieu of riveted joints. It is not practical in many cases for repair firms to connect this joint by riveting.

January 2022 Hist SG Action: PR. TG created.

SC R&A January 2022 Meeting Action: T. Seime presented a PR. TG created.

Hist SG July 2022 Action Mr. Underwood stated there had not been a lot of progress on this item at this point. He did share the document with the code changes that are currently a work in progress. He also stated his concerns with the TG relating to double fillet welded lap joints. These joints are not permitted in unstayed areas of the boiler in ASME Section I. Further, ASME Section VIII, Div. 1 assigns a joint efficiency of 55% which is about 10% less than a double riveted lap joint. Mr. Jowett and Dr. Bryce also addressed the group with similar comments. The group decided that there would be too much work to determine if the welded lap joint would be equivalent or stronger than a double riveted joint, therefore a motion was made to close this item with no action. The motion was seconded and unanimously approved.

SC R&A July 2022 Meeting Action: T. Seime presented to Close w/No Action.

d. Task Group Locomotive

There are currently no TG Locomotive items open for Part 3.

e. NR Task Group

Item Number: A20-48 NBIC Location: Part 3, 1.6 Attachment 11

General Description: Review NR Program (1.6) to 2015 NQA-1 Edition

Subgroup: NR TG

Task Group: R. Spuhl (PM)

Explanation of Need: Latest NQA-1 revision to be compared to NR program (1.6) for consistency.

July Meeting Action: Mr. Edwards presented a Progress Report.

SG R&A January 2022 Meeting Action: R. Spuhl presented a **Progress Report** regarding NQA-1 and Sect. III.

SC R&A January 2022 Meeting Action: R. Spuhl presented a Progress Report regarding NQA-1 and Sect. III.

NR TG July 2022 Meeting Action: R. Spuhl presented a proposal. After discussion the proposal was revised to include additional external audit requirements for Category 1 and 2. The proposal was Unanimously Approved (UA) as revised.

SG R&A July 2022 Meeting Action: R. Spuhl presented. Proposal was UA.

SC R&A July 2022 Meeting Action: R. Spuhl presented. Proposal was UA.

Item Number: A20-52 NBIC Location: Part 3, 1.6.2 a) 2)

Attachment 12

General Description: Rvw NR requirements for ASME Section XI Div. 2 potential applications

Subgroup: NR TG

Task Group: T. Roberts (PM),

Explanation of Need: This was created based on discussion from Item 20-47 dealing with ANIA

requirements.

July Meeting Action: Mr. Edwards presented a Progress Report.

SG R&A January 2022 Meeting Action: R. Spuhl presented a Progress Report

SC R&A January 2022 Meeting Action: R. Spuhl presented a Progress Report

NR TG July 2022 Meeting Action: Mr. Roberts presented a proposal clarifying references to Section XI are specific to "Division 1". The proposal was UA.

SG R&A July 2022 Meeting Action: R. Spuhl presented. The proposal was UA

SC R&A July 2022 Meeting Action: R. Spuhl presented. The proposal was UA

Item Number: A21-02 NBIC Location: Part 3, 1.6 Attachment 13

General Description: Define "Fuel Loading" as it pertains to NR activities

Subgroup: NR TG

Task Group: R. Spuhl (PM)

Explanation of Need: The NR TG would like to clarify "Fuel Loading" as used to determine Category 1,

2 or 3 NR activities.

SG R&A January 2022 Meeting Action: R. Spuhl presented a PR.

SC R&A January 2022 Meeting Action: R. Spuhl presented a Progress Report

NR TG July 2022 Meeting Action: R. Spuhl presented. The proposal was revised and UA.

SG R&A July 2022 Meeting Action: R. Spuhl presented. The proposal was UA

SC R&A July 2022 Meeting Action: R. Spuhl presented. The proposal was UA

Item Number: A21-37 NBIC Location: Part 3, 1.6 Attachment 14

General Description: Parts used in NR Activities

Subgroup: NR TG

Task Group: R. Spuhl (PM)

Explanation of Need: Clarification that parts used in NR activities are fabricated by NR Certificate Holders and inspected by appropriately endorsed National Board commissioned Inspectors.

SG R&A January 2022 Meeting Action: B. Wielgoszinski presented a PR

SC R&A January 2022 Meeting Action: R. Spuhl presented a Progress Report

July 2022 Meeting Action: R. Spuhl presented. A Rvw and Comment LB was never sent out after the Jan. meeting. Discussion held regarding the need of both the MDR and Cert. of Compliance as part of the NR-1. Discussion was held regarding parts fabricated by welding and on the need for a new repair form (e.g. NR-3?) for nuclear repairs activities. The proposal to submit this item to a **Rvw and Comment LB to NR TG** was UA.

SG R&A July 2022 Meeting Action: R. Spuhl presented a PR SC R&A July 2022 Meeting Action: R. Spuhl presented a PR

f. Subgroup Repairs & Alterations

Item Number: A20-67 NBIC Location: Part 3, S6 Attachment 15

General Description: Revisions to Part 3, Supplement 6

Subgroup: Repairs and Alterations

Task Group: R. Underwood (PM), T. McBee, G. Galanes

Explanation of Need: Supplement 6 was implemented into the 2007 Edition of the NBIC Part 3 to provide requirements and guidelines for repairs, alterations and modifications to DOT Transport Tanks using the National Board's "TR" Program (which was never implemented). S6 has been revised over the years to remove reference to the "TR" Program, but still contains many requirements that are not correct. This purpose of this proposal is to review the entire Supplement and make appropriate revisions that comply with NBIC Part 3 and DOT requirements.

SG R&A January 2022 Meeting Action: Mr. Underwood presented a Progress Report.

SC R&A January 2022 Meeting Action: Mr. Underwood presented a Progress Report

SG R&A July 2022 Meeting Action: B. Underwood presented. The proposal was UA with an email sent to the R&A SC to review before tomorrow's SC Meeting

SC R&A July 2022 Meeting Action: B. Underwood presented. The proposal was to go to SC R&A LB for a vote.

Item Number: A20-83 NBIC Location: Part 3, 1.5.1 s) & Attachment 16 9.1

General Description: Definition of Nonconformance

Subgroup: Repairs and Alterations

Task Group: B. Boseo (PM)

Explanation of Need: Action Item 19-60 is proposing revisions/additions to all of 1.5.1. This proposal is to move the definition of "Nonconformance" out of the current 1.5.1 s) paragraph and into the glossary.

SG R&A January 2022 Meeting Action: B. Boseo presented and will have a meeting with Part 4. This was a PR.

SC R&A January 2022 Meeting Action: B. Boseo presented and will have a meeting with Part 4. This was a PR.

SG R&A July 2022 Meeting Action: B. Boseo presented. Since Part 4 will not approve, this item was Closed w/No Action.

SC R&A July 2022 Meeting Action: B. Boseo presented. Since Part 4 will not approve, this item was Closed w/No Action.

Item Number: A21-06 NBIC Location: Part 3, 4.4.2 No Attachment

General Description: Concessions with pressure testing associated with replacement parts

Subgroup: Repairs and Alterations

Task Group: M. Quisenberry (PM), R. Miletti, P. Becker, P. Davis, R. Underwood, M. Winters

Explanation of Need: When replacement parts are manufactured and not tested as required by the original code of construction, there needs to be concessions or considerations associated with the pressure testing requirements as to not detrimentally effect the existing pressure retaining item.

SG R&A January 2022 Meeting Action: M. Quisenberry presented a PR

SC R&A January 2022 Meeting Action: M. Quisenberry presented a PR

SG R&A July 2022 Meeting Action: M. Quisenberry presented. 3.2.2 e) addresses this question. Closed w/No Action.

SC R&A July 2022 Meeting Action: M. Quisenberry presented. 3.2.2 e) addresses this question. Closed w/No Action. -UA

Item Number: A21-12 NBIC Location: Part 3, 3.3.3, 3.4.4, Attachment 17 Section 9

General Description: Clarify the definitions and examples of "Repair" and "Alteration"

Subgroup: Repairs and Alterations

Task Group: K. Moore, P. Shanks, R. Underwood, M. Chestnut, T. Seime

Explanation of Need: Clarify the definitions of "Repair" and "Alteration" in the Glossary and revise the list of examples of each to better define the allowable scope of activities.

History: This Item was created as a result of conversation regarding Interp. Item 20-78 and Action Item 20-54

SG R&A January 2022 Meeting Action: P. Becker was not able to present. This was a PR

SC R&A January 2022 Meeting Action: P. Becker was not able to present. This was a PR

SG R&A July 2022 Meeting Action: P. Becker presented a revised proposal. A Rvw & Comment LB will go to SG R&A.

SC R&A July 2022 Meeting Action: P. Becker presented a revised proposal. A Rvw & Comment LB will go to SG R&A.

Item Number: A21-31 NBIC Location: NBIC Glossary No Attachment

General Description: Revise definition of "Field"

Subgroup: Repairs and Alterations

Task Group: R. Miletti (PM), P. Gilston, M. Toth, J. Walker, E. Cutlip

Explanation of Need: A "Field" site under the current definition could be multiple rented or leased spaces used for repairs/alterations, where there is no single or specific customer or job, but rather the locations(s) are used for conducting repair/alteration activities by personnel employed by the Certificate Holder on a continual basis.

SG R&A January 2022 Meeting Action: R. Miletti presented definitions (from ASME) of Temporary Location and Field Site. This was a PR.

January 2022 Meeting Action: R. Miletti presented definitions (from ASME) of Temporary Location and Field Site. Eric Cutlip was added to the TG. **This was a PR.**

July SG R&A 2022 Meeting Action: P. Gilston presented a PR

July SC R&A 2022 Meeting Action: P. Gilston presented a PR

Item Number: A21-43 NBIC Location: Part 3, Glossary No Attachment

General Description: Defining and revising "Practicable" and "Practical" within the NBIC

Subgroup: Repairs and Alterations

Task Group: M. Toth (PM), B. Underwood, B. Wielgoszinski, M. Wadkinson

Explanation of Need: Defining and revising Practicable and Practical within the NBIC and revising where applicable

SG R&A January 2022 Meeting Action: M. Toth presented a PR. B. Underwood and B. Wielgoszinski volunteered for the TG.

January 2022 Meeting Action: M. Toth presented a PR. M. Wadkinson was added to the TG

SG R&A July 2022 Meeting Action: M. Toth presented that a new item may need to be opened to find these words in the other Parts of the NBIC to verify consistency. This proposal will be sent to a LB to all SG (Parts 1, 2, 3, and 4) for a vote.

SC R&A July 2022 Meeting Action: M. Toth presented a PR.

Item Number: A21-44 NBIC Location: Part 3, Glossary No Attachment

General Description: Defining "De-Rating" within Part 3

Subgroup: Repairs and Alterations

Task Group: M. Toth (PM), B. Underwood, B. Wielgoszinski, M. Wadkinson, L. Dutra

Explanation of Need: Defining de-rating within Part 3

SG R&A January 2022 Meeting Action: M. Toth presented a PR. B. Underwood and B. Wielgoszinski volunteered for the TG.

SC R&A January 2022 Meeting Action: M. Toth presented a PR. M. Wadkinson and Louis Dutra were added to the TG

SG R&A July 2022 Meeting Action: M. Toth presented. A Rvw & Comment LB will go to all SG (Parts 1, 2, 3, and 4).

SC R&A July 2022 Meeting Action: M. Toth presented a PR.

Item Number: A21-45 NBIC Location: Part 3, Supplements Attachment 18

General Description: Add a supplement to address oil, gas and chemical repair & alteration scope

Subgroup: Repairs and Alterations

Task Group: R. Underwood (PM),

Explanation of Need: There has been interest from companies operating with the Oil, Gas and Chemical industries to address certain types of repairs that may exist in ASME PCC-2 or API. NBIC does not have many of these repair methods within the book.

SG R&A January 2022 Meeting Action: R. Underwood presented a proposal. with a motion to LB to SG and SC for a Vote was motioned, seconded, and UA

SC R&A January 2022 Meeting Action: R. Underwood presented a proposal. G. Galanes commented that the title of the Supplement may need to be changed from "Repair Methods of Pressure Vessels and Piping Exclusive to Oil, Gas and Chemical Industries" for public perception purposes. History of API and the NB Codes relationships and PCC-2 standard adoptions were discussed as background.

This was a PR with the intention of holding a LB to SG and SC in the near future.

Update: This item is currently being Rvw and Comment letter balloted to Main Committee. Voice vote required at SG and SC levels to be voted on at MC.

SG R&A July 2022 Meeting Action: B. Underwood presented. Discussion held regarding lap patches being considered as "repairs" instead of "alterations". Per Gary Scribner, BOT may change NB-415 or may create a new document that would give direction as to where this proposal will go (i.e. new type of "R" Stamp, new 'Division' created within the "R" Cert. program, etc.) **This was a PR.**

SC R&A July 2022 Meeting Action: B. Underwood presented a PR.

Item Number: A21-53 NBIC Location: Part 3, S8.5 a) Attachment 19

General Description: Post Repair Inspection of weld repairs to CSEF steels

Subgroup: Repairs and Alterations

Task Group: P. Gilston (PM), E. Cutlip

Explanation of Need: The requirement for Inspector involvement in post-repair inspections to CSEF weld repairs is to ensure future safe operation of the boiler. This is a function of the inservice Authorized Inspection Agency, not the Repair Inspector, whose duties end with completion of repair documentation.

SG R&A January 2022 Meeting Action: P. Gilston presented a motion to LB to Part 3 and Part 2 SGs - UA

January 2022 Meeting Action: P. Gilston presented a motion to **LB to Part 2 and Part 3 SGs**. The motion was UA.

MC January 2022 Meeting Action: LB to Part 2 and 3 SG. This was a PR

Update: SG R&A approved the proposal with 1 disapproval and 2 abstentions. The SG Inspection ballot did not pass, receiving 4 approval votes, 6 disapproval votes, and 2 abstentions.

SG R&A July 2022 Meeting Action: P. Gilston presented a PR.

SC R&A July 2022 Meeting Action: P. Gilston presented a PR.

Item Number: A21-67 NBIC Location: Part 3, 3.4.9 No Attachment

General Description: Add welding requirements to plugging firetubes

Subgroup: Repairs and Alterations

Task Group: P. Gilston (PM), K. Moore, Trevor Sieme, M. Quisenberry

Explanation of Need: The current NBIC does not have enough direction or requirements for welding tube plugs in firetubes.

SG R&A January 2022 Meeting Action: P. Gilston presented. Discussion took place on if omitting mechanical plugging of firetubes and changing 3.3.4.9 to be specific to plugging by welding would be received as "mechanical repairs" would not be allowed by the NBIC (as opposed to just not addressed). Trevor Sieme and M. Quisenberry volunteered to join the Task Group. The proposal was taken back for work. This was a PR.

SC R&A January 2022 Meeting Action: P. Gilston presented a PR

Item Number: A21-70 NBIC Location: Part 3, Table 2.3 Attachment 20

General Description: Updating Table 2.3 in Part 3 with newest SWPSs

Subgroup: Repairs and Alterations

Task Group: J. Sekely (PM)

Explanation of Need: 13 SWPSs have been updated and approved by AWS, and the list of

SWPSs in Table 2.3 will need to be updated to reflect these changes.

SG R&A January 2022 Meeting Action: Mr. Sekely was unable to present

January 2022 Meeting Action: Mr. Sekely presented a PR.

Update: This item is currently being balloted to SC R&A.

July SG R&A 2022 Meeting Action: Passed SC LB. To be on MC Agenda.

Item Number: A21-80 NBIC Location: Part 3, 3.3.3(h)(2) Attachment 21

General Description: Mechanical Replacement of Shell or Head

Subgroup: Repairs and Alterations

Task Group: R. Underwood (PM)

Explanation of Need: This Code revision and corresponding interpretation (I21-79) would provide clarity to NBIC users and address whether mechanical replacement of these components is considered a repair.

SG R&A January 2022 Meeting Action: R. Underwood presented a proposal. The proposal was UA.

SC R&A January 2022 Meeting Action: R. Underwood presented a proposal. The proposal was UA.

MC January 2022 Meeting Action: – Took with I21-79 (PR) and this Action Item was reviewed and discussed. T. Seime presented and the proposal was taken back by R. Underwood for more work based on comments. This was a PR.

SG R&A July 2022 Meeting Action: B. Underwood presented. Motion to Close w/No Action was UA.

SC R&A July 2022 Meeting Action: B. Underwood presented. Motion to Close w/No Action was UA.

Item Number: A21-82 NBIC Location: Part 3, 3.3.3(s) No Attachment

General Description: Examples of Repairs

Subgroup: Repairs and Alterations

Task Group: P. Davis (PM), R. Underwood, P. Gilston, , J. Ferreira, J. Walker, E. Cutlip, P. Miller, L. Dutra

Explanation of Need: Adding "repair" to 3.3.3(s) would then address use of different weld material. Currently 3.3.3(s) only addresses replacement of the part, not repair (Repair is addressed in 3.3.3(r)).

SG R&A January 2022 Meeting Action: R. Underwood presented a PR. P. Gilston, P. Davis, J. Ferreira, J. Walker, E. Cutlip, volunteered for the TG

SC R&A January 2022 Meeting Action: R. Underwood presented a PR

SG R&A July 2022 Meeting Action: B. Underwood **presented a PR**. The PM was changed to P. Davis. P. Miller and L. Dutra were added to the taskgroup.

SC R&A July 2022 Meeting Action: P. Davis presented a PR.

New Items:

Item Number: A22-02 NBIC Location: Part 3, 3.3.2 e) 1) No Attachment

General Description: Part 4 Item A21-83 may impact part 3, 3.3.2 e) 1)

Subgroup: Repairs and Alterations

Task Group: M. Toth (PM), B. Derby, L. Dutra, M. Carlson

Explanation of Need: Part 4 Item A21-83 was reviewed as it may impact part 3, 3.3.2 e) 1) examples of Routine Repairs. An Item for Part 3 will be opened to address "valve" repairs as they relate to SRVs.

SG R&A July 2022 Meeting Action: M. Toth presented. The group verified 3.3.2 e) 1) verbiage. Marty to work with Part 4 to verify no impact to Part 3. **This was a PR.**

SC R&A July 2022 Meeting Action: M. Toth presented a PR

Item Number: A22-04 NBIC Location: Part 3, 3.3.3 s) Attachment 22

General Description: Clarification on Part 3, 3.3.3 Example of Repairs s)

Subgroup: Repairs and Alterations

Task Group: T. White

Explanation of Need: The paragraph was written for pressure-retaining parts not just vessels as stated later in the first sentence.

SG R&A July 2022 Meeting Action: T. White presented. The proposal was UA as revised.

SC R&A July 2022 Meeting Action: T. White presented. The proposal was UA

Item Number: A22-05 NBIC Location: Part 3, 4.2(a) & 1.2 (a & b) Attachment 23

General Description: Clarify NDE requirements as it pertains to OCC edition.

Subgroup: Repairs and Alterations

Task Group: Don Kinney (PM), B. Derby, P. Davis

Explanation of Need: This Action Item is requested to clarify NDE requirements as it relates to the edition used for the original code of construction.

SG R&A July 2022 Meeting Action: D. Kinney presented. Part 2 Item 21-41 was reviewed, as it was related. This Item had 2 revisions, for paragraph 1.2 and 4.2. The proposal regarding 1.2 was revised. **Both proposals were UA** as revised.

SC R&A July 2022 Meeting Action: D. Kinney presented. Part 2 Item 21-41 was reviewed, as it was related. This Item had 2 revisions, for paragraph 1.2 and 4.2. The proposal regarding 1.2 was revised. **The proposals were UA** as revised.

Item Number: A22-11 NBIC Location: Part 3, S5 Attachment 24

General Description: Changes to Yankee Dryer P3 S5

Subgroup: Repairs and Alterations

Task Group: Jerry Jessick (PM)

Explanation of Need: Various updates including to recognize steel in addition to cast iron, and to promote consistency of Supplements of each Part.

SG R&A July 2022 Meeting Action: Presentation by Mr. Jessick. (A22-10 from Part 2 SG Installation). The proposal was revised based on comments. The **proposal was UA** and emailed to SC and MC for review so a voice vote may be possible for inclusion into the 2023 Edition of the NBIC.

SC R&A July 2022 Meeting Action: J. Jessick presented. The proposal was UA as revised.

Item Number: A22-12 NBIC Location: Part 3, 3.3.5.2 & 3.4.5.1 Attachment 25

General Description: Lost or Destroyed UDS

Subgroup: Repairs and Alterations

Task Group: T. Seime (PM)

Explanation of Need: To provide the ability to repair/alter these vessels with a reconstructed UDS.

SG R&A July 2022 Meeting Action: T. Sieme presented. This passed SC LB and will be on MC Agenda. (VERIFY LB MEMBERS – SC looks like SG)

SC R&A July 2022 Meeting Action: T. Sieme presented. The proposal was UA.

Close I21-60

Item Number: A22-17 NBIC Location: Part 3, 4.4.2 & S5.7.2 Attachment 26

General Description: NBIC Part 3, S5.7.2, a), 1) and the examination methods of Part 3, 4.4.2, c

Subgroup: Repairs and Alterations

Task Group: T. McBee (PM), J. Jessick.

Explanation of Need: An additional examination option is needed for alterations performed to NBIC S5.7.2 a) 1).

SG R&A July 2022 Meeting Action: T. McBee presented. The proposal was revised to add leak test shall also be performed with VT. **UA as revised.**

SC July 2022 Meeting Action: T. McBee presented. The proposal was UA.

Item Number: A22-18 NBIC Location: Part 3, Glossary Attachment 27

General Description: Definition of blowdown and blowoff

Subgroup: Repairs and Alterations

Task Group: K. Moore (PM).

Explanation of Need: These terms are not consistently used throughout the industry. This is to provide guidance to use the correct term when addressing the equipment or the action.

SG R&A July 2022 Meeting Action: K. Moore presented. The proposal was compared to ASME Sect. I and B31.1 definitions for consistency. G. Scribner commented on the history of these terms and their use in the industry and Codes and the need for these definitions. M. Quisenberry volunteered for the taskgroup. Rvw & Comment LB to all SG (Part 1, 2, 3, and 4)

SC R&A July 2022 Meeting Action: K. Moore presented a PR.

Item Number: A22-19 NBIC Location: Part 3, 5.2.2 No Attachment

General Description: R Certificate Holders with Design Only Scope

Subgroup: Repairs and Alterations

Task Group: J. Ferreira (PM). R. Valdez, G. Scribner, B. Schaefer

Explanation of Need: To add new paragraphs 5.2.2 d) and 5.2.2 e) which will provide guidance for R Certificate Holders with "Design Only" on which activities they are permitted to perform and how they and the Inspectors shall complete the R-2 Form.

SG R&A July 2022 Meeting Action: J. Ferreira presented. After discussion, it was pulled back for more work. Several members added to taskgroup. This was a PR.

SC R&A July 2022 Meeting Action: J. Ferreira presented a PR.

Item Number: A22-23 NBIC Location: Part 3, Section 8 Attachment 28

General Description: Tech Inquires moved from Section 8 to Introduction.

Subgroup: Repairs and Alterations

Task Group: B. Schaefer (PM).

Explanation of Need: The process for submission of Interpretations, Code Revisions, and Code Additions has been moved to the Introduction of this book.

SC R&A July 2022 Meeting Action: T. Hellman presented. The proposal was UA as revised.

- 10. Discussion was held by L. Ponce regarding Quality Manual scope statements requirements for Cert. Holders.
 - **a.** Email Luis (<u>lponce@nbbi.org</u>) your opinion on scope statement requirements.
- 11. Future Meetings
 - January 2023 Charleston, SC
 - July 2023 TBD
- 12. Adjournment @ 1:10 PM by Chair K. Moore.

Respectfully submitted,

Terrence Hellman

Terrence Hellman

SC R&A Secretary

Subcommittee R&A Attendance - July 13, 2022

MEMBERS:	Interest Category	In Person	Remote	Not In Attendance
Moore, Kathy	National Board Certificate Holders	X		
Toth, Marty	General Interest		X	
Becker, Patricia	Manufacturers	X		
Boseo, Brian	General Interest	X		
Frazier, Steven	Jurisdictional Authorities		X	
Hopkins, Craig	National Board Certificate Holders		X	
Kinney, Donald	Jurisdictional Authorities	X		
McBee, Timothy	Authorized Inspection Agencies	X		
Miletti, Ray	National Board Certificate Holders	X		
Moedinger, Linn	Users		X	
Morelock, Brian	Users		X	
Quisenberry, Michael	National Board Certificate Holders	X		
Schaefer, Benjamin	National Board Certificate Holders	X		
Seime, Trevor	Jurisdictional Authorities	X		
Sekely, James	General Interest		X	
Shanks, Paul	Authorized Inspection Agencies		X	

VISITORS:	Email	In Person	Remote	
Davis, Paul	paul.davis22@woodplc.com	X		
Galanes, George	ggalanes@diamondtechnicalservices.com	X		
ilston, Philip	philip_gilston@hsb.com	X		
essick, Jerry	jjessick@fusion-etc.com			
iefert, John	jsiefert@epri.com	X		
immons, Timothy	tsimmons@boilermakers.org	X		
perko, Walter	wsperko@bellsouth.net	X		
puhl, Raymond	RAYMOND SPUHL@HSB.COM	X		
routt, Rob	rob.troutt@tdlr.texas.gov			
Inderwood, Robert	robert underwood@hsb.com	X		
aldez, Rick	rvaldez@arbinc.com	X		
Vadkinson, Melissa	melissa.wadkinson@fulton.com			
Vhite, Thomas	thomas.white@nrg.com	X		
Aoedinger, Linn	linnwm@supernet.com		X	
oth, Bryan	tothbm@westinghouse.com			
Bates, Johnathon	bateslocal26@yahoo.com	X		
Outra, Louis	Ldutra@babycityboiler.com	X		
erreira. Jon	JONATHAN FERREIRA@HSB.COM	X		
Goossens, Greg	ggoossens@nationalboard.org			
Cennedy, Randy	crkennedv@babcock.com	X		
AacIntosh, Richard	rmacintosh@boilermakers.org			
Ailler, Philip	philip.miller@linde.com	X		
once. Luis	lponce@nationalboard.org	X		
cribner, Gary	gscribner@nationalboard.org	X		
kiles. Sean	sean.skiles@fulton-pacific.com	X		
Carlson, Michael	camx235@lni.wa.gov			
Dacanay, Julius	julius.j.dacanay@hawaii.gov			
Chssassi, Aziz	aziz.khssassi@rbq.gouv.qc.ca		X	
Memmer, Timothy	tmemmer@propanetank.com		X	
anghavi, Vishal	vishal.sanghavi@arcosa.com	X		
chaser, Matt	mschaser@e2g.com		X	
hah, M. A.	abmindustrialservices@gmail.com			
riplett, Andrew	triplettal@ornl.gov		X	
oeseph Beauregard		X	-	
Randy Kennedy			X	
amie Walker			X	
Mike Belson			X	
Mike Richards			X	
Bob McGuire			X	

Committee Member (In-person)
Committee Member (Remote)
Committee Member (Remote)
Visitor (In-person)
Visitor (Remote)



PROPOSED REVISION OR ADDITION

Item No.	
A 22-21	
Subject/Title	
Example of Alteration	
NBIC Location	
Part: Repairs and Alterations; Section: 3; Paragraph: 3.4.4 d)	
Project Manager and Task Group	
Source (Name/Email)	
Robert Underwood / robert_underwood@hsb.com	
Statement of Need	
A change in dimension of a pressure retaining item is not considered an nozzle diameter in some cases). This revision would provide clarity the capability be considered an alteration.	n alteration in many cases (increasing nozzle/tube thickness, increasing at only a change in dimension that decreases its pressure retaining
Background Information	
This Code revision has been in the works with Item 21-12 for over a yea 3.4.4 d) and also a corresponding intent interpretation.	ar, but due to delay in its approval we are creating a new Item to address
Existing Text	Proposed Text
3.4.4 d) A change in the dimensions or contour of a pressure-retaining item;	d) A change in the dimensions or contour of a pressure-retaining item that decreases its pressure retaining capability;
	<u> </u>

		VOTE:						
(COMMITTEE	Approved	Disapproved	Abstained	Not Voting	Passed	Failed	Date

INTENT INTERPRETATION 20-78

Repairs and Alterations of Tube Bundles

Inquiry No.	20-78
Source	Micah Davidian Email: mdavidian@dir.ca.gov Phone: +1 (559) 4456817
Subject	Submission is for R Certificate Holders we provide Repair Inspection services for
	Background Information: For 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.
Edition	2019 Part 3 3.3.3 s) and 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)
Reply	

Committee's Question	Q1: When a tubesheet in a replacement tube bundle has the same material as the original design but is thicker due to adding corrosion allowance where the original design did not include corrosion allowance or adding additional corrosion allowance or adding a machining allowance, is this considered a repair or alteration? Q2: In the case of 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? Q3: When a replacement tube bundle has the same tubesheet material as the original design but is thicker due to a change in the analytic method, is this considered a repair or alteration. Q1: Is it the intent that a change in the dimensions or contour of a pressure-retaining
	item that decreases its pressure retaining capability be an alteration?
Committee's Reply	A1: Alteration A2: Yes A3, Alteration A1; Yes.
Rationale	Original questions 1,2 &3 have all be rolled up into Q&A1. All, per para 3.4.4 d) a change in dimension or contour of a PRI is an example of an alteration, the tube sheet getting thicker is a change in dimension. The glossary definition of PRI includes material so is not limited to the overall vessel/boiler Q3-1 believe this is in reference to a heat exchanger built before Part UHX was adopted into Section VIII Div.1 so would have been built to TEMA rules which aren't 100 % the same as Part UHX. I do not think we should explain how to get around this in the answer to an interpretation. Based on revision A22-21 this is the intent of the code
SC Vote	
NBIC Vote	
Negative Vote Comments	



PROPOSED INTERPRETATION

Item No.
21-39
Subject/Title
Routine repair scope
Project Manager and Task Group
Paul Shanks with Phillip Gilston
Source (Name/Email)
Paul Shanks / paul.shanks@onecis.com
Statement of Need
Some R-certificate holders and AlAs are making huge (100 square feet) weld metal buildup type routine repairs on the basis that the components being built up are only 5" tubes and 3.3.2 e) 1) says welded repairs to 5" tubes are routine. As 3.3.2 e) includes "shall be limited to" shouldn't exceeding any one of the listed limitations preclude the routine repair approach?
Background Information
Repairs that exceed the limit listed in 33.2 e) 3) are being conducted which potentially places the public in harm's way.
Proposed Question
Q1, In a boiler water wall which has been subject to wastage and requires weld metal build up, does the fact that the tubes are 5" or smaller mean that said build up is always routine regardless of the area involved? Q2 or if the area of weld build up exceeds 100in2 does the size and nature of the component being repaired become irrelevant?
Proposed Reply
A1, No A2, Yes
Committee's Question 1
For a repair to be considered routine in nature must it meet all categories in 3.3.2 e)?
Committee's Reply 1
No
Rationale
3.3.2 e) states routine repairs shall be limited to these categories, which are considered individually as discrete items
Committee's Question 2
Committee's Reply 2
Rationale
Tunonalo

	VOTE:			Atta	chment 3 - Page	2 of 3	
COMMITTEE	Approved	Disapproved	Abstained	Not Voting	Passed	Failed	Date

CODE INTERPRETATIONS

Requests for code Interpretations shall provide the following:

a) Inquiry

Provide a condensed and precise question, omitting superfluous background information and, when possible, composed in such a way that a "yes" or a "no" reply, with brief provisos if needed, is acceptable. The question should be technically and editorially correct.

b) Reply

Provide a proposed reply that clearly and concisely answer the inquiry question. Preferably the reply should be "yes" or "no" with brief provisos, if needed.

c) Background Information

Provide any background information that will assist the committee in understanding the proposed Inquiry and Reply Requests for Code Interpretations must be limited to an interpretation of the particular requirement in the code. The Committee cannot consider consulting type requests such as:

A review of calculations, design drawings, welding qualifications, or descriptions of equipment or Parts to determine compliance with code requirements;

A request for assistance in performing any code-prescribed functions relating to, but not limited to, material selection, designs, calculations, fabrication, inspection, pressure testing, or installation; or

A request seeking the rationale for code requirements.



Item No.

PROPOSED INTERPRETATION

21-75
Subject/Title
Routine Repairs
Project Manager and Task Group
Source (Name/Email)
Logan Somers / Isomers@harder.com
Statement of Need
The wording "but does not include nozzles to pressure-retaining items" could lead onto interpreting the nozzle as a whole including the joint attaching the nozzle to the PRI.
Background Information
When discussing scheduling of repairs this information is used by the owner to determine when the unit may be brought down for repair based on the availability of the Inspector.
Proposed Question
May the identical replacement of a waisted flange at the end of a nozzle off a PRI be considered a routine repair in accordance with the requirements of 3.3.2 when only the flange is replaced and not the joint attaching the nozzle to the PRI?
Proposed Reply
No
Committee's Question 1 May the in-kind replacement of a flange connected to a nozzle be considered a routine repair when only the flange is replaced, and not the weld joint attaching the nozzle to the PRI; if and when the nozzle meets the requirements for tubes and pipes in Part 3, 3.3.2 e)1)? May the identical replacement in kind of a waisted flange at the end of a nozzle, NPS 5 (DN 125) in diameter or smaller, off attached to a PRI be considered a routine repair in accordance with the requirements of Part 3 Section 3.3.2 (e) (1) when neither postweld heat treatment nor NDE—other than visual is required and only the flange is replaced and not the joint attaching the nozzle to the PRI?
Committee's Reply 1
<u>Yes</u>
Rationale
The replaced flange would be considered a fitting in the category of Part 3 Section 3.3.2 (e) (1).
Committee's Question 2
Committee's Reply 2
Rationale

Formatted: Height: Exactly 1.1"

	VOTE:						
COMMITTEE	Approved	Disapproved	Abstained	Not Voting	Passed	Failed	Date

CODE INTERPRETATIONS

Requests for code Interpretations shall provide the following:

a) Inquiry
Provide a condensed and precise question, omitting superfluous background information and, when possible, composed in such a way that a "yes" or a "no" reply, with brief provisos if needed, is acceptable. The question should be technically and editorially correct.

b) Reply Provide a proposed reply that clearly and concisely answer the inquiry question. Preferably the reply should be "yes" or "no" with brief provisos, if needed.

c) Background Information
Provide any background information that will assist the committee in understanding the proposed Inquiry and Reply Requests for Code Interpretations must be limited to an interpretation of the particular requirement in the code. The Committee cannot consider consulting type requests such as:

A review of calculations, design drawings, welding qualifications, or descriptions of equipment or Parts to determine compliance with code requirements;

A request for assistance in performing any code-prescribed functions relating to, but not limited to, material selection, designs, calculations, fabrication, inspection, pressure testing, or installation; or

A request seeking the rationale for code requirements.



Item No. 21-75

PROPOSED INTERPRETATION

Subject/Title
Routine Repairs
Project Manager and Task Group
Source (Name/Email)
Logan Somers / Isomers@harder.com
Statement of Need
The wording "but does not include nozzles to pressure-retaining items" could lead onto interpreting the nozzle as a whole including the joint attaching the nozzle to the PRI.
Background Information
When discussing scheduling of repairs this information is used by the owner to determine when the unit may be brought down for repair based on the availability of the Inspector.
Proposed Question
May the identical replacement of a waisted flange at the end of a nozzle off a PRI be considered a routine repair in accordance with the requirements of 3.3.2 when only the flange is replaced and not the joint attaching the nozzle to the PRI?
Proposed Reply
No
Committee's Question 1 May the in-kind replacement of a flange connected to a nozzle be considered a routine repair when only the flange is replaced, and not the weld joint attaching the nozzle to the PRI: If and when the nozzle meets the requirements for tubes and pipes in Part 3, 3,3,2 e)1)? May the identical replacement in kind of a waisted flange at the end of a nozzle. NPS 5 (DN 125) in diameter or smaller, off attached to a PRI be considered a routine repair in accordance with the requirements of Part 3 section 3,2 e)(1) then neither postweld heat treatment nor NDE-other than visual is required and only the flange is replaced and not the joint attaching the nozzle to the PRI?
Committee's Reply 1
Yes
Rationale
The replaced flange would be considered a fitting in the category of Part 3 Section 3.3.2 (e) (1).
Committee's Question 2
Committee's Reply 2
Rationale

Formatted: Height: Exactly 1.1"

		VOTE:						
ſ	COMMITTEE	Approved	Disapproved	Abstained	Not Voting	Passed	Failed	Date
ı								
ł								
ı								
ı								

CODE INTERPRETATIONS

Requests for code Interpretations shall provide the following:

a) Inquiry
Provide a condensed and precise question, omitting superfluous background information and, when possible, composed in such a way that a "yes" or a "no" reply, with brief provisos if needed, is acceptable. The question should be technically and editorially correct.

b) Reply Provide a proposed reply that clearly and concisely answer the inquiry question. Preferably the reply should be "yes" or "no" with brief provisos, if needed.

c) Background Information
Provide any background information that will assist the committee in understanding the proposed Inquiry and Reply Requests for Code Interpretations must be limited to an interpretation of the particular requirement in the code. The Committee cannot consider consulting type requests such as:

A review of calculations, design drawings, welding qualifications, or descriptions of equipment or Parts to determine compliance with code requirements;

A request for assistance in performing any code-prescribed functions relating to, but not limited to, material selection, designs, calculations, fabrication, inspection, pressure testing, or installation; or

A request seeking the rationale for code requirements.



PROPOSED INTERPRETATION

Item No.
21-79
Subject/Title
Mechanical Replacement of Shell or Head
Project Manager and Task Group
Source (Name/Email)
Robert Underwood / robert_underwood@hsb.com
Statement of Need
This interpretation and corresponding Code revision would provide clarity to NBIC users and address whether mechanical replacement of these components is considered a repair.
Background Information
There are two conflicting NBIC interpretations relating to mechanical replacement of parts. Interpretation 01-29 states that NBIC neither requires nor prohibits documenting mechanical repair installation on a Form R-1. Recently passed interpretation 19-11 states that mechanical replacement of pressure retaining components in ASME Section VIII, Div. 3 vessels are considered a repair activity. 19-11 cites paragraph 3.3.3 which provides examples of repairs. Paragraph 3.3.3(h)(2) specifically states that replacement of head or shell in accordance with the original design. It does not specify whether head was replaced by welding or mechanical attachment.
Bronocod Quaction
Proposed Question
Is mechanical replacement of a shell or head of a pressure retaining item considered a repair activity?
Proposed Reply
Yes, see Part 3, 3.3.3(h).
Committee's Question 1
Committee's Reply 1
Rationale
Committee's Question 2
Committee's Reply 2
Rationale

CODE INTERPRETATIONS

Requests for code Interpretations shall provide the following:

a) Inquiry

Provide a condensed and precise question, omitting superfluous background information and, when possible, composed in such a way that a "yes" or a "no" reply, with brief provisos if needed, is acceptable. The question should be technically and editorially correct.

b) Reply

Provide a proposed reply that clearly and concisely answer the inquiry question. Preferably the reply should be "yes" or "no" with brief provisos, if needed.

c) Background Information

Provide any background information that will assist the committee in understanding the proposed Inquiry and Reply Requests for Code Interpretations must be limited to an interpretation of the particular requirement in the code. The Committee cannot consider consulting type requests such as:

A review of calculations, design drawings, welding qualifications, or descriptions of equipment or Parts to determine compliance with code requirements;

A request for assistance in performing any code-prescribed functions relating to, but not limited to, material selection, designs, calculations, fabrication, inspection, pressure testing, or installation; or

A request seeking the rationale for code requirements.



THE NATIONAL BOARD OF BOILER AND PRESSURE VESSEL INSPECTORS

PROPOSED INTERPRETATION

Item No.
22-14
Subject/Title
Overlaid Replacement Parts
Project Manager and Task Group
Source (Name/Email)
Harold Greer / Harold.greer32@yahoo.com
Statement of Need
Replacement parts that are documented using a Manufacturer's Partial Data report that have been inspected by an Authorized Inspector may still be supplied as a replacement part under paragraph 3.2.2 b) and therefore not require a Hydro test per Paragraph 3.2.2 e). Panels made from Overlaid tubes and for single overlaid tube Dutchman that contain only weld overlay, where the overlay is not considered to be pressure retaining when the overlay is not considered part of the strength of the boiler tube per ASME Section I PW-44. May be supplied as replacement parts under paragraph 3.2.2 b). The purpose of the overlay is to extend the life of boiler tubes in the waste to energy corrosive environment from external wear.
Background Information
ASME Section I PG-112.6 states that a P-4 is neither required nor prohibited for pressure parts that do not contain pressure-retaining welds. NBIC Part 3 section 3 paragraph 3.2.2 c)replacement parts subject to internal or external pressure fabricated by welding, "which require inspection by an Authorized Inspector could interpret this as, any replacement part that is certified with a form P-4 would therefore require inspection by an Authorized Inspector and would then require a Hydro test by paragraph 3.2.2 e) prior to installation in the boiler. It is the opinion of this manufacturer that Overlaid boiler tubes where the overlay is not considered as part of the strength of the boiler tube per PW-44 of ASME Section I, is not pressure retaining. Hydro testing of Weld Overlay would not provide meaningful data and would requires excessive costs for no benefit. Such as performance of 200 hydro tests at 1.5 x MAWP for section I, for 200 Overlaid tube Dutchmen, where each tube must be witnessed by the Inspector prior to installation in a boiler. Whereas, after installation there are 400 actual pressure retaining welds in a single test at a pressure that need only verify leak tightness and the acceptance of the inspector.
Proposed Question
Q1) May a boiler furnace wall panel that contains no pressure retaining welds and has been documented on a P-4 Manufacturer's Partial Data Report in accordance with PG-112.6 of ASME Section I, be provided as a replacement part in accordance with NBIC Part 3, 3.2.2 b)? Q2) The same panel referred to in Q1 is manufactured with a weld overlay that is not part of the strength of the boiler tube (corrosion resistance, hard facing, etc) and documented on a P4 Manufacturer's Partial Data Report in accordance with PG-112.6 of ASME Section I. May this wall panel be provided as a replacement part in accordance with NBIC Part 3, 3.2.2 b)? Q3) May overlaid boiler tubes, where the overlay is not pressure retaining and is not considered part of the strength of the boiler tube per ASME Section I, PW-44, supplied individually, may these overlaid tubes be provided as a replacement part in accordance with Paragraph 3.2.2 b)?
Proposed Reply
Q1) YES Q2) YES Q3) YES
Committee's Question 1
Committee's Reply 1
Rationale

Committee's Question 2	
	Attachment 7 - Page 2 of 3
Committee's Reply 2	
Rationale	

	VOTE:						_	
COMMITTEE	Approved	Disapproved	Abstained	Not Voting	Passed	Failed	Date	
								ł
								1

CODE INTERPRETATIONS

Requests for code Interpretations shall provide the following:

a) Inquiry

Provide a condensed and precise question, omitting superfluous background information and, when possible, composed in such a way that a "yes" or a "no" reply, with brief provisos if needed, is acceptable. The question should be technically and editorially correct.

b) Reply

Provide a proposed reply that clearly and concisely answer the inquiry question. Preferably the reply should be "yes" or "no" with brief provisos, if needed.

c) Background Information

Provide any background information that will assist the committee in understanding the proposed Inquiry and Reply Requests for Code Interpretations must be limited to an interpretation of the particular requirement in the code. The Committee cannot consider consulting type requests such as:

A review of calculations, design drawings, welding qualifications, or descriptions of equipment or Parts to determine compliance with code requirements;

A request for assistance in performing any code-prescribed functions relating to, but not limited to, material selection, designs, calculations, fabrication, inspection, pressure testing, or installation; or

A request seeking the rationale for code requirements.

Item 18-94: Requirements for spring alterations in a graphite pressure vessel

Explanation of Need:

• This item is needed 1) to clarify that both the initial spring compression and the spring stiffness are critical variables for establishing the stress state for graphite tubes and tubesheets, and 2) require that the corrected design rules in ASME Section VIII 2019 Edition or later be used. The use of 2019 or later edition will also prompt consideration of the spring rod stiffness, evaluation of the assembled (zero pressure) case, use of primary stress criteria for the operating cases owing to the large deflections involved, improved buckling analysis, and check for unloading of springs in the operating cases because of differential thermal expansion.

Background Information:

• Graphite shell and tube exchangers may be equipped with springs to counter forces from shell-side and tube-side pressures. The springs have a preload set at the time of assembly, and mechanically interact with the shell, tubes and tubesheet in the design and operating cases. Under ASME Section VIII Div. 1, the initial spring force is selected by the designer, and is determined by the spring stiffness multiplied by the initial compression (deflection); the resulting stresses in the tubes and tubesheets are calculated for the design and operating cases according to Part UIG-34(b). Prior to the 2019 Edition, the calculation considered the stiffness (spring rate) of the springs but did not account for the initial compression of the springs, so resulting stress calculations are not valid. Part UIG-34(b) was revised for the 2019 Edition to include the initial compression of the springs, along with other changes as described in the attached background document for ASME Record 16-1251 (see Item 18-94 folder in the July 2022 Meeting folder on nbfileshare.org).

Proposed Changes:

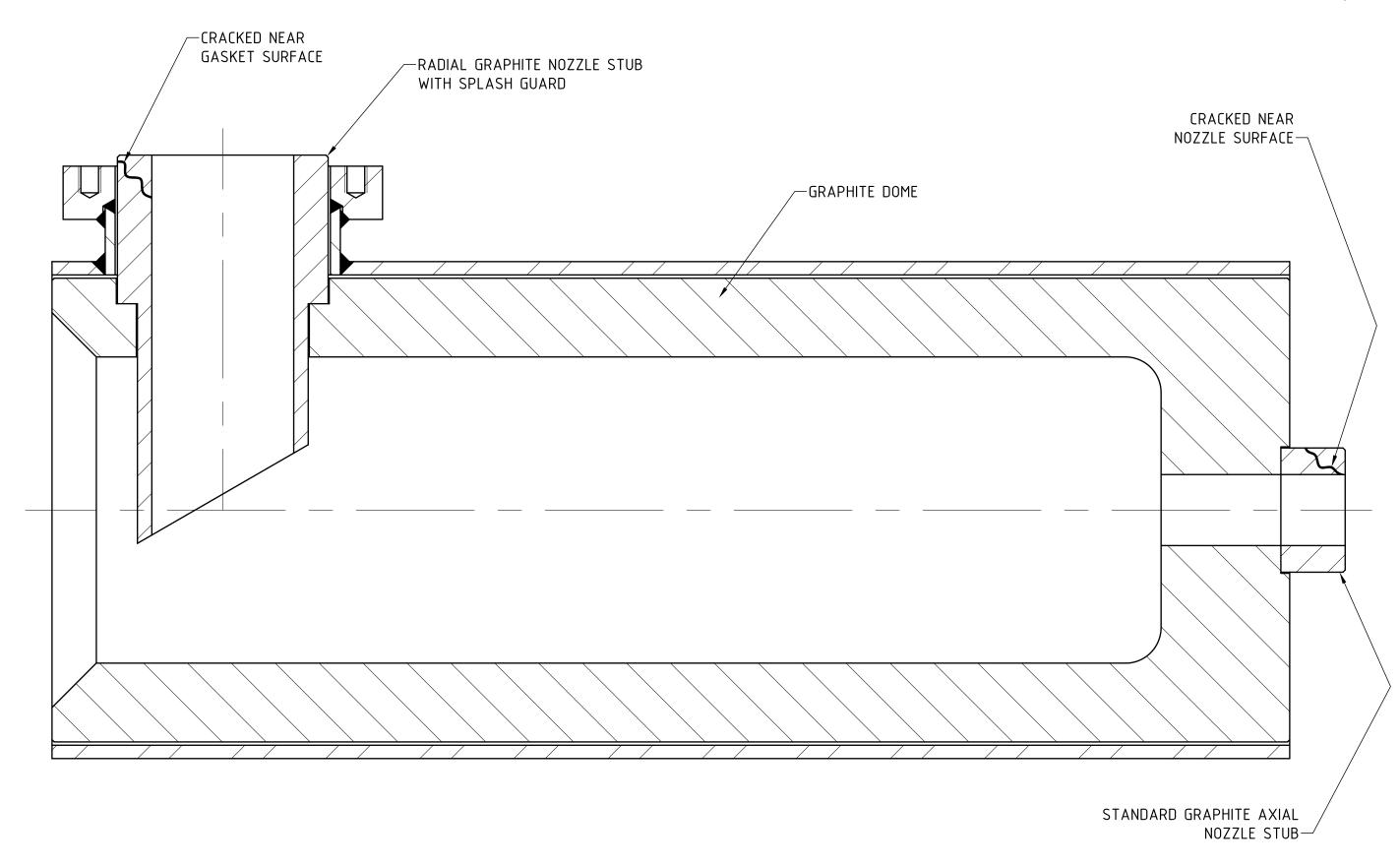
S3.4 ALTERATIONS

- a) The requirements provided in this section shall apply, insofar as they are applicable to the materials discussed herein. Completed alterations shall be subjected to a pressure test not less than that required by the code of construction. The test pressure shall be maintained for a minimum of 30 minutes. The pressure shall be reduced to MAWP and maintained for inspection.
- a)b) Alteration of the spring design (e.g. change in stiffness or the initial compression) of a graphite shell-and-tube heat exchanger shall be done only after revised calculations have been prepared in accordance with the "R" Certificate Holder's Quality Control System and accepted by the Inspector. When the standard governing the original construction is the ASME Code, the calculations shall comply with Section VIII, Div. 1 2019 Edition or later.
- b)c) The nameplate shall be applied in accordance with Section 5 of this part. The letter "G" shall be applied to the nameplate under the "R" stamp when graphite alterations are made. The alternate procedure defined in 5.10 may be used in lieu of the stamping and nameplate attachment requirements of NBIC Part 3, Section 5.
- c)d) Organizations performing alterations under an "R" stamp program shall register such alterations with the National Board.

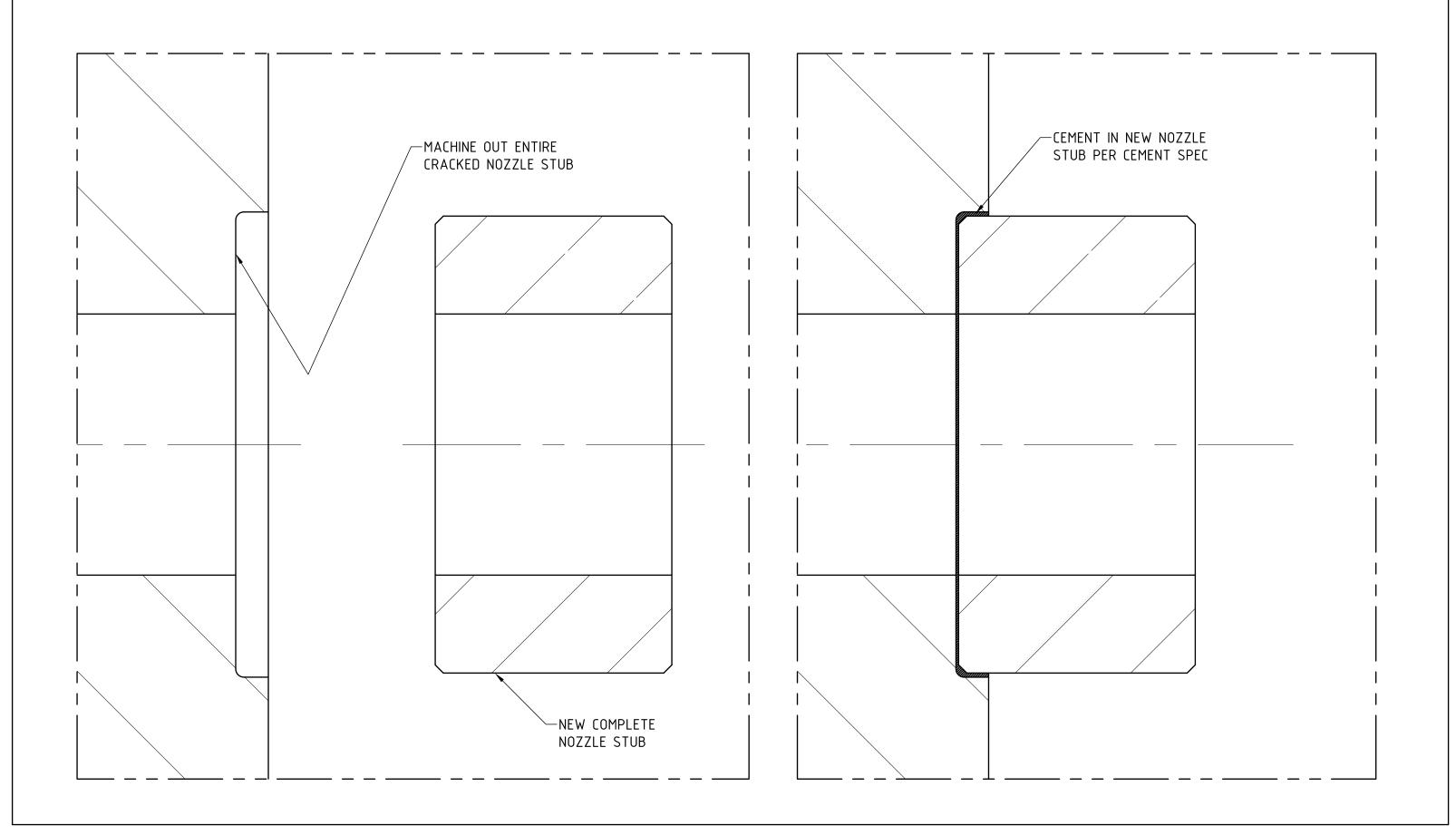
Item 19-74: Routine repair requirements for partial nozzle replacement

Part 3, S3.3 ROUTINE REPAIRS

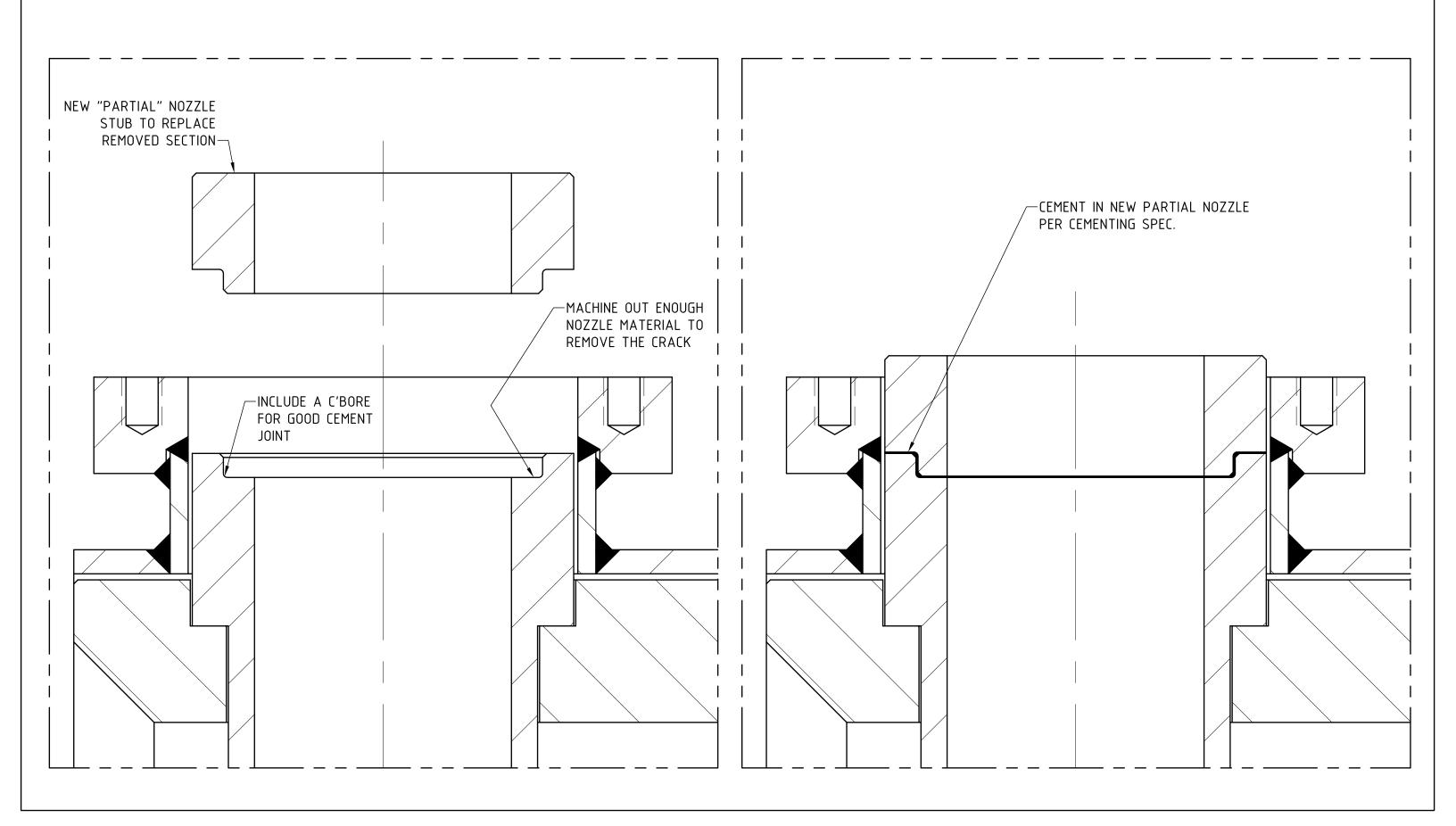
- a) The following repairs shall be considered routine, and shall comply with NBIC Part 3, 3.3.2 a), b), and c).
 - 1) Machining routine repair shall not include the machining of pressure-retaining parts with the exception of minor machining for cleaning and joint preparation not to exceed 1/32 in. (0.8 mm) of material thickness.
 - 2) Repair of Gasket Surfaces re-machining of gasket surfaces, re-serrating, or flattening is permitted if the design thickness is maintained.
 - 3) Replacing Individual Tubes drilling out and replacing tubes with new tubes or repaired tubes. Only certified materials shall be used for this repair.
 - 4) Nozzle Replacement <u>complete or partial</u> replacement of nozzles by removing the <u>old nozzle</u> and cementing a new <u>nozzle</u> all or a length of the existing nozzle and cementing a new <u>piece</u> in place. This is applicable for nozzles with inside diameters not exceeding 6 inches (152 mm).



NOZZLE REPLACEMENT PER S3.3 a) 4) [CURRENT]



PARTIAL NOZZLE REPLACEMENT PER S3.3 a) 4) [PROPOSED]



Item 19-79: Reword Part 3, S3.5.4 h) to clarify cementing procedure for plugs

S3.5.4 PLUGGING OF LEAKING OR DAMAGED TUBES

- g) The cement shall be prepared per the cement manufacturer's instructions.
- h) When cementing the plug(s), 100% of individual plugsall contact surfaces of each plug, as well as the inside diameter of the tube opening(s), shall be coated with cement. The plug(s) shall then be inserted one by one, against each other, into each end of the tube(s) being plugged.
- i) Once the plugging is completed, and before the cement cures, the endplug(s) may need to be held in place, as newly cemented plugs may exhibit a tendency to dislodge from the plugged tube(s) prior to final curing of the cement.

Item No.: 20-48

Subject Title: Review "NR" Program requirements against NQA-1 2015 Edition

NBIC Location: Part 3

Project Manager and Task Group: Paul Edwards/Ray Spuhl, NR TG

Source Name and Email:

Statement of Need: The 2015 Edition of NQA-1 is currently referenced by the 2019 Edition of ASME Section III, Table NCA-7100-2 and by the 2019 Edition of ASME Section XI, Table IWA-1600-1. NBIC Item 20-48 has been opened to review the NR Program in Part 3, Section 1.6, for update to current ASME III and XI QA Program requirements.

Background Information:

Category 1 applications under the NR Program are established for repair / replacement activities on any ASME Section III certified item or system prior to fuel loading, regardless of physical location or installation status. By reference to ASME III, the NBIC QA Program criteria for NR Category 1 applications need to be consistent with the 2015 Edition of NQA-1.

Category 2 applications under the NR Program are established for repair / replacement activities on items or systems under the scope of ASME Section XI, regardless of physical location. By reference to ASME XI, the NBIC QA Program criteria for NR Category 2 applications need to be consistent with the 2015 Edition of NQA-1.

Category 3 requirements under the NR Program are established for other than ASME III or ASME XI applications and are therefore not directly impacted by NQA-1 - 2015. NBIC Part 3, 1.6.8.1, does, however, permit a Category 3 NR Certificate holder to optionally include QA Program requirements from Category 1 and/or 2 applications, to allow consistency in the NR Certificate holder's QA Program.

Existing Text:

Part 3, 1.6.6.2 d)

d) Design Control

The provisions identified in ASME NQA-1, Part 1, Requirement 3, shall apply except Paragraph 601.

The following additional requirements shall be considered when applicable:

1) The "NR" Certificate Holder shall establish measures to ensure applicable requirements of the owner's design specifications, owner's requirements, and

owner's design specifications, owner's requirements, and code of construction requirements are

Proposed Test:

Part 3, 1.6.6.2 d)

d) Design Control

The provisions identified in ASME NQA-1, Part 1, Requirement 3, shall apply except Paragraph 601.

The following additional requirements shall be considered when applicable:

1) The "NR" Certificate Holder shall establish measures to ensure applicable requirements of the owner's design specifications, owner's requirements, and code of construction requirements are correctly translated into drawings, specifications, procedures and instructions.

- 2) All design documents, including revisions, shall be verified by the "NR" Certificate Holder to be correct and adequate in accordance with the owners requirements.
- 3) Repair/replacement plans shall be completed prior to performing any work, inspections, examinations or testing; however repair/replacement plans are not required for the design phase of a repair/replacement activity including activities that require design only (except rerating).
- 4) The repair/replacement plan (see NBIC Part 3, Table 1.6.9) shall identify any applicable Code Edition/ Addenda and Code Cases, owner's requirements and the Construction Code Edition/Addenda utilized to perform the work.
- 5) The repair/replacement plan shall identify expected life of the item when less than the intended life as specified in the owner's design specification.
- 6) The "NR" Certificate Holder shall ensure that specifications, drawings, procedures and instructions do not conflict with the owner's design specifications. A system must be described in the Quality Assurance Manual to resolve or eliminate such conflicts. Resolution shall consider the Design Specification Requirements, as well as, the owner requirements, Jurisdictional and Regulatory Authority Requirements as applicable.

- correctly translated into drawings, specifications, procedures and instructions.
- 2) All design documents, including revisions, shall be verified by the "NR" Certificate Holder to be correct and adequate in accordance with the owners requirements.
- 3) Repair/replacement plans shall be completed prior to performing any work, inspections, examinations or testing; however repair/replacement plans are not required for the design phase of a repair/replacement activity including activities that require design only (except rerating).
- 4) The repair/replacement plan (see NBIC Part 3, Table 1.6.9) shall identify any applicable Code Edition/ Addenda and Code Cases, owner's requirements and the Construction Code Edition/Addenda utilized to perform the work.
- 5) The repair/replacement plan shall identify expected life of the item when less than the intended life as specified in the owner's design specification.
- 6) The "NR" Certificate Holder shall ensure that specifications, drawings, procedures and instructions do not conflict with the owner's design specifications. A system must be described in the Quality Assurance Manual to resolve or eliminate such conflicts. Resolution shall consider the Design Specification Requirements, as well as, the owner requirements, Jurisdictional and Regulatory Authority Requirements as applicable.
- 7) Computer programs used for design analysis shall meet the requirements of NQA-1, Part II, Subpart 2.7 unless independently verified with the design analysis for each application.

Part 3, 1.6.6.2 d)

s) Audits

The provisions identified in ASME NQA-1, Part 1, and Requirement 18 shall apply and shall include the following:

A comprehensive system of planned and periodic audits of the "NR" Certificate Holder's Quality
Assurance Program shall be performed. Audit frequency shall be specified in the organization's Quality
Assurance Manual. Audits shall be conducted at least annually (within 12 months) for any ongoing code activity to verify compliance with Quality Assurance Program requirements, performance criteria and to determine the effectiveness of the Quality
Assurance Program. When no code work has been performed, the required annual audit need only include those areas of responsibility required to be continually maintained such as training, audits, organizational structure, and Quality Assurance

Part 3, 1.6.6.2 d)

s) Audits

The provisions identified in ASME NQA-1, Part 1,-and Requirement 18 shall apply and shall include the following:

A comprehensive system of planned and periodic audits of the "NR" Certificate Holder's Quality

Assurance Program shall be performed. <u>Internal and Supplier</u> Audit frequenc<u>yies</u> shall be specified in the organization's Quality

Assurance Manual. Internal Audits shall be conducted at least annually (within 12 months) for any ongoing code activity to verify compliance with Quality Assurance Program requirements, performance criteria and to determine the effectiveness of the Quality Assurance Program. When no code work has been performed, the required annual internal audit need only include those areas of responsibility required to

Program revisions. The Quality Assurance Manual shall as a minimum describe the following:

- 1) Audits shall be performed in accordance with written procedures or checklists by qualified audit personnel not having direct responsibility in areas being audited;
- 2) Audit personnel shall be qualified in accordance with the current requirements of ASME NQA-1;
- 3) Audit results shall be documented and reviewed by responsible management for adequacy and effectiveness of the quality assurance program;
- 4) Requirements for follow-up actions shall be specified for any deficiencies noted during the audit;
- 5) Audit records and applicable documentation shall be made available to the Authorized Nuclear Inspection Agency for review; and
- 6) Audit records shall include as a minimum;
- a. Written procedures;
- b. Checklists;
- c. Reports;
- d. Written replies; and
- e. Completion of corrective actions.

Performance of Authorized Inspection Agency audits required by ASME QAI-1 and NB-263, RCI-1 shall be addressed in the Quality Assurance Manual.

be continually maintained such as training, audits, organizational structure, and Quality Assurance Program revisions <u>etc.</u> External audits (e.g., Supplier audits) of organizations with certification/accreditation permitted by ASME may not be required if acceptable to the Regulatory Authority.

The Quality Assurance Manual shall as a minimum describe the following:

- 1) Audits shall be performed in accordance with written procedures or checklists by qualified audit personnel not having direct responsibility in areas being audited;
- 2) Audit personnel shall be qualified in accordance with the current requirements of ASME NQA-1;
- 3) Audit results shall be documented and reviewed by responsible management for adequacy and effectiveness of the quality assurance program;
- 4) Requirements for follow-up actions shall be specified for any deficiencies noted during the audit;
- 5) Audit records and applicable documentation shall be made available to the Authorized Nuclear Inspection Agency for review; and
- 6) Audit records shall include as a minimum;
- a. Written procedures;
- b. Checklists:
- c. Reports;
- d. Written replies: and
- e. Completion of corrective actions.

Performance of Authorized Inspection Agency audits required by ASME QAI-1 and NB-263, RCI-1 shall be addressed in the Quality Assurance Manual.

Part 3, 1.6.7.2 s)

s) Audits

A comprehensive system of planned and periodic audits of the "NR" Certificate Holder's Quality Assurance Program shall be performed. Audit frequency shall be specified in the organization's Quality Assurance Manual. Audits shall be conducted at least annually (within 12 months) to verify compliance with Quality Assurance Program requirements, performance criteria and to determine the effectiveness of the Quality Assurance Program. When no code work has been performed, the required annual audit need only include those areas of responsibility required to be continually maintained such as training, audits, organizational structure, Quality Assurance Program revisions, etc. The Quality Assurance Manual shall as a minimum describe the following: 1) Audits shall be performed in accordance with written procedures or checklists by qualified audit personnel not having direct responsibility in areas being audited; 2) Audit personnel shall be qualified in accordance with

3) Audit results shall be documented and reviewed by

the current requirements of NQA-1;

responsible management for adequacy and

effectiveness of the quality assurance program;

Part 3, 1.6.7.2 s)

s) Audits

A comprehensive system of planned and periodic audits of the "NR" Certificate Holder's Quality
Assurance Program shall be performed. Internal and
External Audit frequency shall be specified in the

organization's Quality Assurance Manual. Internal Audits shall be conducted at least annually (within 12 months) to verify compliance with Quality Assurance Program requirements, performance criteria and to determine the effectiveness of the Quality Assurance Program. When no code work has been performed, the required annual internal audit need only include those areas of responsibility required to be continually maintained such as training. audits, organizational structure, Quality Assurance Program revisions, etc. External audits (e.g., Supplier audits) shall be performed on a triennial basis and supplemented by annual evaluations of the Supplier's performance to determine if the regular schedule audit frequency shall be maintained or decreased or if other corrective action is required. A continuous or ongoing evaluation of the Supplier's performance may be conducted in lieu of the annual evaluations, provided that the results are reviewed in order to determine if corrective

- 4) Requirements for follow-up actions for any deficiencies noted during the audit;
- 5) Audit records and applicable documentation shall be made available to the Authorized Nuclear Inspection Agency for review; and
- 6) Audit records shall include as a minimum:
- a. written procedures;
- b. checklists;
- c. reports:
- d. written replies; and
- e. completion of corrective actions.

Performance of Authorized Inspection Agency audits required by ASME QAI-1 and NB-263, RCI-1 shall be addressed in the Quality Assurance Manual.

action is required. A grace period of 90 days may be applied to scheduled audits and annual evaluations of supplier performance. When the grace period is used, the next scheduled date for the activity shall be based on the activity schedule date and not on the date the activity was actually performed. If the activity is performed early, the next schedule date shall be based on the date the activity was actually performed.

The Quality Assurance Manual shall as a minimum describe the following:

- 1) Audits shall be performed in accordance with written procedures or checklists by qualified audit personnel not having direct responsibility in areas being audited:
- 2) Audit personnel shall be qualified in accordance with the current requirements of NQA-1;
- 3) Audit results shall be documented and reviewed by responsible management for adequacy and effectiveness of the quality assurance program;
- 4) Requirements for follow-up actions for any deficiencies noted during the audit;
- 5) Audit records and applicable documentation shall be made available to the Authorized Nuclear Inspection Agency for review; and
- 6) Audit records shall include as a minimum:
- a. written procedures;
- b. checklists;
- c. reports;
- d. written replies; and
- e. completion of corrective actions.

Performance of Authorized Inspection Agency audits required by ASME QAI-1 and NB-263, RCI-1 shall be addressed in the Quality Assurance Manual.

Part 3, 1.6.8.2 s)

s) Audits

A comprehensive system of planned and periodic audits of the "NR" Certificate Holder's Quality Assurance Program shall be performed. Audit frequency shall be specified in the organization's Quality Assurance Manual. Audits shall be conducted at least annually (within 12 months) to verify compliance with Quality Assurance Program requirements, performance criteria and to determine the effectiveness of the Quality Assurance Program. When no code work has been performed, the required annual audit need only include those areas of responsibility required to be continually maintained such as training, audits, organizational structure, Quality Assurance Program revisions, etc. The Quality Assurance Manual shall as a minimum describe the following: 1) Audits shall be performed in accordance with written procedures or checklists by qualified audit personnel not having direct responsibility in areas being audited;

Part 3, 1.6.8.2 s)

s) Audits

A comprehensive system of planned and periodic audits of the "NR" Certificate Holder's Quality Assurance Program shall be performed. Audit frequency shall be specified in the organization's Quality Assurance Manual. Audits shall be conducted at least annually (within 12 months) to verify compliance with Quality Assurance Program requirements, performance criteria and to determine the effectiveness of the Quality Assurance Program. When no code work has been performed, the required annual audit need only include those areas of responsibility required to be continually maintained such as training, audits, organizational structure, Quality Assurance Program revisions, etc. The Quality Assurance Manual shall as a minimum describe the following: 1) Audits shall be performed in accordance with written procedures or checklists by qualified audit personnel not having direct responsibility in areas being audited;

- 2) Audit personnel shall be qualified in accordance with recognized standards, such as NQA-1;
- 3) Audit results shall be documented and reviewed by responsible management for adequacy and effectiveness of the quality assurance program;
- 4) Requirements for follow-up actions for any deficiencies noted during the audit;
- 5) Audit records and applicable documentation shall be made available to the Authorized Nuclear Inspection Agency for review;
- 6) Audit records shall include as a minimum:
- a. written procedures;
- b. checklists;
- c. reports;
- d. written replies; and
- e. completion of corrective actions.

Performance of Authorized Inspection Agency audits required by ASME QAI-1 and NB-263, RCI-1 shall be addressed in the Quality Assurance Manual.

- 2) Audit personnel shall be qualified in accordance with recognized standards, such as NQA-1;
- 3) Audit results shall be documented and reviewed by responsible management for adequacy and effectiveness of the quality assurance program;
- 4) Requirements for follow-up actions for any deficiencies noted during the audit;
- 5) Audit records and applicable documentation shall be made available to the Authorized Nuclear Inspection Agency for review;
- 6) Audit records shall include as a minimum:
- a. written procedures;
- b. checklists;
- c. reports;
- d. written replies; and
- e. completion of corrective actions.

Performance of Authorized Inspection Agency audits required by ASME QAI-1 and NB-263, RCI-1 shall be addressed in the Quality Assurance Manual.

Form "R" Reports, Records, or Documents	Instructions	Minimum Retention Period
d) Administrative record review of the "R" Certificate Holder's administrative processes.	Records supporting completed administrative reviews or audits of procedures or processes required by the "R" Certificate Holder's Quality System Manual, or in combination with the applicable part of the NBIC Part 3, Supplement 6 as it applies to the identified scope listed on the "R" Certificate of Authorization.	Subject to review during the triennial evaluation of the certificate holder's Quality System.

1.6 "NR" PROGRAM REQUIREMENTS

1.6.1 SCOPE

- a) This section provides requirements that must be met for an organization to obtain a National Board Certificate of Authorization to use the "NR" Symbol Stamp for repair/replacement activities to nuclear items constructed in accordance with the requirements of the ASME Code or other internationally recognized codes or standards for construction or inservice inspection of nuclear facilities.
- b) For administrative requirements to obtain or renew a National Board "NR" Certificate of Authorization and the "NR" Symbol Stamp, refer to National Board Procedure NB-417, Accreditation of "NR" Repair Organizations.

1.6.2 **GENERAL**

a) An organization applying for an "NR" Certificate of Authorization shall have a written Quality Assurance Program (QAP) that details the specific requirements to be met based on the intended category of activities selected by that organization as described below and shown in Table 1.6.2. Controls used, including electronic capabilities, in the Quality Assurance Program shall be documented in a Quality Assurance Manual (QAM). Controls required to be included within the QAM shall include who, what, when, where, why and how with an understanding that the how can be a reference to an implementation procedure or instruction. Quality activities to be described in the Quality Assurance Program are identified in Section 1.6.5 of this part. Applicants shall address all requirements in their Quality Assurance Program based on the category of activity and scope of work to be performed (organization's capabilities) to which certification is requested.

1) Category 1

Any ASME Section III Code certified item or system requiring repair/replacement activities irrespective of physical location and installation status prior to fuel loading.

2) Category 2

After fuel loading, any item or system under the scope of ASME Section XI requiring repair/ replacement activities irrespective of physical location. Based on regulatory or jurisdictional acceptance, Category 2 may be used prior to fuel loading.

3) Category 3

REVISE TO READ: ASME Section XI Division 1

Items other than those covered by Category 1 or Category 2, requiring repair/replacement activities irrespective of physical location, installation status and fuel loading.

b) Repair organizations performing repairs of pressure relief devices in nuclear service shall meet the additional requirements of NBIC Part 4, Section 4 and NBIC Part 4, Supplement 6.

TABLE 1.6.2"NR" QUALITY ASSURANCE PROGRAM (QAP) REQUIREMENTS

Category of Activity	Owner	Organizations other than Owner	
Category 1	10 CFR Part 50 Appendix B ^{1, 2} and ASME Section III NCA-4000 & NQA-1 Part 1	10 CFR Part 50 Appendix B ^{1, 2} and ASME Section III NCA-4000 & NQA-1 Part 1	
Category 2 Revise to read: ASME Section XI Division 1	10 CFR Part 50, Appendix B ^{1, 2} or NQA-1 ³ , Part 1 and ASME Section 14, 1WA-4142 Revise to read: ASME	10 CFR Part 50, Appendix B ^{1, 2} supplemented as needed with Owner's QA program; or ASME NQA-1 ³ , Part 1; or ASME Section III, NCA-4000	
Category 3	ASME Section XI Division 1 Specify the Standard to which certification is desired	ASME NQA-1 ³ , Part 1, or Specify the Standard to which certification is desired	
Note 4.			

Note 1:

Code of Federal Regulations (CFR) – rules and regulations published by the executive departments and agencies of the federal government of the United States.

Note 2:

10 CFR 50 Appendix B – Title 10 of the Code of Federal Regulations Part 50 Appendix B describes the quality assurance criteria for nuclear plants and fuel reprocessing plants.

Note 3:

The Edition (and Addenda, as applicable) of NQA-1 to be utilized shall be the latest endorsed by the Regulatory Authority, or as specified in the Owner's QA Program description reviewed and approved by the Regulatory Authority.

1.6.2.1 DEFINITIONS

The NBIC terms and definitions shall be supplemented, as applicable, by the terms and definitions of ASME Section III, Section XI, NQA-1, or other standards specified by the Regulatory Authority.

The following terms are as defined in the NBIC Glossary of Terms Section 9:

- a) Authorized Inspection Agency
- b) Authorized Nuclear Inspection Agency
- c) Jurisdiction
- d) "NR" Certificate Holder

(21)

TABLE 1.6.2.1 ACRONYMS

ASME	American Society of Mechanical Engineers	
Applicant	An Organization applying for "NR" Certificate of Authorization (new or renewal)	
CFR	Code of Federal Regulations	
Code	ASME Code of Construction, Section III, Division I, (NCA, NB, NC, ND, NE, NF, NG, and NH) or ASME Section XI Rules for Inservice Inspection of Nuclear Power Plant Components as applicable.	
Jurisdiction	Revise to read: ASME cement Authority	
NB	Section XI Division 1 er and Pressure Vessel Inspectors	
NBIC	National Board Inspection Code	
NB-263, RCI-1	Rules for Commissioned Inspectors	
NCA	ASME Section III, Subsection NCA, General Requirements for Division 1 and Division 2	
NQA-1*	ASME Quality Assurance Requirements for Nuclear Facility Applications	
NR	Nuclear Repair	
"NR" CH	"NR" Certificate Holder	
QA	Quality Assurance	
QAI-1	ASME Qualifications for Authorized Inspection	
QAM	Quality Assurance Manual	
QAP	Quality Assurance Program	
QC	Quality Control	
WA	ASME Section III, Division 3, Subsection WA, General Requirements	

ITEM A20-52

Note:

1.6.3 PREREQUISITES FOR ISSUING A NATIONAL BOARD "NR" CERTIFICATE OF **AUTHORIZATION**

Before an organization can obtain a National Board "NR" Certificate of Authorization, the organization shall:

- a) Have and maintain an inspection agreement with an Authorized Nuclear Inspection Agency accepted in accordance with NB-360, National Board Acceptance of Authorized Inspection Agencies (AIA) Accredited by the American Society of Mechanical Engineers (ASME), with accreditation to perform repair and alteration acceptance inspections.
- b) Have a written Quality Assurance Program which includes the quality assurance manual and any supporting procedures, instructions and specifications required to comply with this section. The Quality Assurance Program shall address all controls for the intended category and scope of activities requested.
- Have a current edition of the NBIC.

^{*} Edition(s) endorsed by the Regulatory Authority

d) Have available ASME Section XI, the code of construction and referenced code sections and standards appropriate for the score of work to be performed. ASME Section XI and codes of construction (Editions/Addenda) shall meet the requirements of the Regulatory Authority and the owner.

Revise to read: ASME Section XI Division 1

AINING OR RENEWING A NATIONAL BOARD "NR" CERTIFICATE OF

Revise to read: ASME Section XI Division 1

- a) Before an "NR" Certificate of Authorization will be issued or renewed, the applicant must have the Quality Assurance Program and the implementation of the program reviewed and found acceptable by representatives of the National Board, the Jurisdiction, and the Authorized Nuclear Inspection Agency. The Jurisdiction will be the National Board Member Jurisdiction in which the applicant is located or the location where the Quality Assurance Program is demonstrated/implemented. At the request of the Jurisdiction, or where there is no National Board Member Jurisdiction, the National Board representative shall act on behalf of the Jurisdiction. The implementation of the Quality Assurance Program shall be satisfactorily demonstrated by the organization. Demonstration of implementation shall meet the most stringent (classification) code requirements for the scope and category of work to be specified on the Certificate of Authorization or as requested by the applicant.
- b) If the applicant is an ASME "N" type Certificate of Authorization holder, has satisfactorily demonstrated within the last twelve (12) months the implementation of their Quality Assurance Program and can provide documentation that the organization is capable of implementing its Quality Assurance Program as being in compliance with this section, a further hardware verification implementation may not be necessary.
- c) The Regulatory Authority or Jurisdiction, upon request to the National Board, may attend the survey process for an "NR" Certificate of Authorization to be issued or renewed.
- d) The "NR" *Certificate of Authorization* holder shall be subject to an audit annually by the Authorized Nuclear Inspection Agency to ensure compliance with the Quality Assurance Program.

1.6.5 QUALITY ASSURANCE PROGRAM

- a) An applicant or a holder of a National Board "NR" Certificate of Authorization ("NR" Certificate Holder) shall have and maintain a written Quality Assurance Program. The Quality Assurance Program shall satisfactorily meet the requirements of this section, and Jurisdictional and Regulatory requirements as applicable. The Quality Assurance Program may be brief or voluminous, depending on the circumstances. It shall be treated confidentially by the National Board and available for review by the Survey Team.
- b) Each applicant or "NR" Certificate Holder is responsible for establishing and executing a Quality Assurance Program. The applicant or "NR" Certificate Holder may subcontract activities needed to implement the Quality Assurance Program, as limited by ASME Section III and XI, but responsibility for adherence to the Quality Assurance Program remains with the Applicant or "NR" Certificate Holder.
- c) These rules set forth the requirements for planning, managing, and implet Section XI Division 1 It's Quality Assurance Program to control and ensure quality is performed and maintained during repair/ replacement activities of components, items, parts, and systems for nuclear facilities. These rules are to be the basis for evaluating such programs prior to the issuance or renewal of the National Board "NR" Certificate of Authorization. Rules identified in subsections 1.6.6, 1.6.7 and 1.6.8 of this section detail the Quality Assurance Program requirements for each category of activity. These rules are established to meet and follow the requirements specified in NBIC Part 3, Table 1.6.2 of this section.

QUALITY ASSURANCE PROGRAM REQUIREMENTS FOR CATEGORY 1 1.6.6 **ACTIVITIES**

1.6.6.1 **SCOPE**

Owners or organizations other than owners shall have a written Quality Assurance Program meeting the criteria specified in NBIC Part 3, Table 1.6.2 for Category 1 activities. The following quality elements shall be specified and described within the QAM.

ITEM A20-52

1.6.6.2 **QUALITY PROGRAM ELEMENTS**

(21)

a) Organization

The provisions identified in ASME NQA-1, Part 1, Requirement 1, shall apply in its entirety. The authority and responsibility for individuals involved in activities affecting quality shall be clearly established and documented throughout the Quality Assurance Program and identified on a functional organizational chart contained within the QA Manual.

- Statement of Policy and Authority shall:
 - 1) identify the titles of individuals who have the authority and responsibility charged with ensuring the quality program is implemented as described;
 - 2) confirm their freedom in the organization to identify quality problems and to initiate, recommend and provide solutions:
 - 3) include a statement that if there is a disagreement in the implementation of the quality assurance program, the matter is to be referred for resolution to a higher authority and shall be resolved in a manner that will not conflict with code, jurisdiction/regulatory authority or quality program requirements;
 - include a statement of the full support of management; and
 - 5) be dated and signed by a senior management official within the organization.
- Quality Assurance Program (QAP)

The provisions identified in ASME NQA-1, Part 1, Requirement 2, shall apply, except paragraph 301. Additionally, the following criteria shall be used when developing and maintaining the QAP.

- The Quality Assurance Program as used in this section shall include a written Quality Assurance Manual, with supporting procedures and instructions used to meet all the requirements of this Section.
- 2) Qualification of non-destructive examination personnel shall be as required by the code of construction or as specified in the owner's Quality Assurance Program.
- 3) The "NR" Certificate Holder shall be responsible for advising the Authorized Nuclear Inspection Agency of proposed changes to the Quality Assurance Manual to obtain acceptance of the Authorized Nuclear Inspector Supervisor before putting such changes into effect. The "NR" Certificate Holder shall make a current controlled copy of the Quality Assurance Manual available to the Authorized Nuclear Inspector and Authorized Nuclear Inspector Supervisor. The Certificate Holder shall be responsible for notifying the Authorized Nuclear Inspector of QAM changes, including evidence of acceptance by the Authorized Nuclear Inspector Supervisor.
- The Quality Assurance Manual need not be in the same format or sequential arrangement as the requirements in these rules as long as all applicable requirements have been covered.

- 5) The "NR" Certificate Holder shall implement and maintain a program for qualification, indoctrination, training and maintaining proficiency of personnel involved with quality functions, including personnel of subcontracted services.
- 6) The "NR" Certificate Holder shall address in their QAM the requirements for interfacing with the owner specified in NBIC Part 3, 1.6.9.
- Specified controls including responsibilities for personnel shall be described in the quality assurance program.

d) Design Control

The provisions identified in ASME NQA-1, Part 1, Requirement 3, shall apply except Paragraph 601. The following additional requirements shall be considered when applicable:

- The "NR" Certificate Holder shall establish measures to ensure applicable requirements of the owner's design specifications, owner's requirements, and code of construction requirements are correctly translated into drawings, specifications, procedures and instructions.
- 2) All design documents, including revisions, shall be verified by the "NR" Certificate Holder to be correct and adequate in accordance with the owners requirements.
- 3) Repair/replacement plans shall be completed prior to performing any work, inspections, examinations or testing; however repair/replacement plans are not required for the design phase of a repair/replacement activity including activities that require design only (except rerating).
- 4) The repair/replacement plan (see NBIC Part 3, Table 1.6.9) shall identify any applicable Code Edition/Addenda and Code Cases, owner's requirements and the Construction Code Edition/Addenda utilized to perform the work.
- 5) The repair/replacement plan shall identify expected life of the item when less than the intended life as specified in the owner's design specification.
- 6) The "NR" Certificate Holder shall ensure that specifications, drawings, procedures and instructions do not conflict with the owner's design specifications. A system must be described in the Quality Assurance Manual to resolve or eliminate such conflicts. Resolution shall consider the Design Specification Requirements, as well as, the owner requirements, Jurisdictional and Regulatory Authority Requirements as applicable.

e) Procurement Document Control

The provisions identified in ASME NQA-1, Part 1, Requirement 4, shall apply. Procurement documents shall require suppliers to provide a Quality Assurance Program consistent with the applicable requirements of ASME Section III and this section.

f) Instructions, Procedures, and Drawings

The provisions identified in ASME NQA-1, Part 1, Requirement 5, shall apply. All activities affecting quality shall be prescribed by documented instructions, procedures or drawings appropriate for the scope of work to be performed. Instructions, procedures or drawings shall describe acceptance criteria to ensure quality activities are accomplished.

g) Document Control

The provisions identified in ASME NQA-1, Part 1, Requirement 6, shall apply. The Quality Assurance Program shall detail measures to control the preparation, review, issuance, use, approval and distribution of all documents related to quality as identified in the applicants Quality Assurance Program. Revisions shall meet the same requirements as the originals unless the applicant specifies other

measures within their program. Measures shall ensure the latest approved documents represent the repair/replacement activities performed.

ITEM A20-52

n) Control of Purchased Material, Items, and Services

The provisions identified in ASME NQA-1, Part 1, Requirement 7 shall apply, except:

- 1) Procurement of Authorized Inspection Agency services is not applicable as specified in paragraph 507.
- The decision to perform bid evaluation as described in paragraph 300 is the responsibility of the "NR" Certificate Holder.
- For Certificates of Conformance specified in paragraph 503 changes, waivers, or deviations including resolution of non-conformances must meet the requirements of ASME Section III and this Section.
- 4) The provisions identified in ASME NQA-1, Part 1, Requirement 7, paragraph 700 are not applicable to this section.
- 5) Documentary evidence for items shall conform to the requirements of ASME Section III, NCA and this Section. Materials shall meet the material certification requirements as specified in ASME Section III, NCA-3800 or NCA-4470 as applicable. Documented evidence for ASME stamped items is satisfied by a Manufacturer's Data Report. Utilization of unqualified source material shall meet the requirements of ASME Section III, NCA-4255.5.
- 6) The "NR" Certificate Holder may obtain items from an owner, provided the owner provides the required documentation and items are identified to meet Code and the Certificate Holders Quality Assurance Program. The "NR" Certificate Holder shall not be required to audit the owner as an approved supplier, provided the items used are exclusively for the owner and the owner procured and controlled the items under the owner's Quality Assurance Program.
- 7) The Quality Assurance Program shall establish controls to ensure all purchased materials, items, and services conform to the requirements of the owner's design specifications and the code of construction Edition/Addenda used to perform the work. Materials shall meet the requirements specified in ASME Section III, NCA-3800 or NCA-4470 as applicable.
- i) Identification and Control of Items

The provisions identified in ASME NQA-1, Part 1, Requirement 8, shall apply and include the following additional requirements:

- Controls shall assure only correct and acceptable items, parts and components are used or installed when performing repair/replacement activities.
- 2) Welding, brazing and fusing materials shall be identified and controlled.
- 3) Required Certified Material Test Reports and Certificates of Conformance shall be received, traceable to the items, reviewed to comply with the material specification and found acceptable.
- 4) The "NR" Certificate Holder shall utilize checklists to identify required characteristics using accepted procedures, compliance with records received, results of examinations and tests performed, range of values when required, and spaces for inclusion of document numbers and revision levels, signatures initials / stamps and dates of examinations or tests performed, verified, and/or witnessed by the "NR" Certificate Holder's qualified Representative and Authorized Nuclear Inspector.

2021

j) Control of Processes

The provisions identified in ASME NQA-1, Part 1, Requirement 9, shall apply. Documents used to control processes shall include spaces for signatures, initials, stamps and dates that activities were performed by the Certificate Holder's representative and the Authorized Nuclear Inspector when the processes conforms to the specified acceptance criteria as listed on drawings, procedures, instructions, specifications or other appropriate documents including revisions.

k) Examinations, Tests, and Inspections

The provisions identified in ASME NQA-1, Part 1, Requirement 10, shall apply, except paragraph 700 for inspections during operations is not required.

- A repair/replacement plan shall be described in the Quality Assurance Manual that addresses
 required information to perform the work needed for repair/replacement activities. Spaces shall
 be included for mandatory hold points where witnessing is required by the "NR" Certificate Holder's Qualified Representative, the Authorized Nuclear Inspector or the owner's representative, if
 required. Work shall not proceed beyond designated mandatory hold points without documented
 consent as appropriate.
- 2) The following guidance is provided for information to be included within the repair/replacement plan:
 - a. A detailed description of repair/replacement activities to be performed;
 - b. Describe any defects and examination methods used to detect the defects;
 - c. Defect removal method and requirements for identifying reference points;
 - d. Any procedures including revisions utilized; (e.g. welding, brazing, heat treat, examination, testing) and material requirements;
 - e. Required documentation and stamping;
 - f. Acceptance criteria used to verify acceptability; and
 - g. Applicable Code editions/addenda and code cases.
- Repair/Replacement plans and evaluations shall be subject to review by the Jurisdictional and Regulatory Authority when required.

I) Test Control

The provisions identified in ASME NQA-1, Part 1, Requirement 11 shall apply. Testing shall be performed in accordance with written test procedures with acceptance criteria clearly defined. Prerequisites for performing each test to include calibration, equipment, trained personnel, environmental conditions and provisions for data acquisition shall be described. Test results shall be documented and evaluated by qualified personnel.

m) Control of Measuring and Test Equipment

The "NR" Certificate Holder may utilize calibration and test activities performed by subcontractors when surveys and audits are performed. As an alternative to performing a survey and audit for procuring Laboratory Calibration and Test Services, the "NR" Certificate Holder as documented in their Quality Program may accept accreditation of an International Calibration and Test Laboratory Services by the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement (MRA) provided this alternative method is described in the "NR" Certificate Holder's Quality Program and the following requirements are met:

 The "NR" Certificate Holder shall review and document verification that the supplier of calibration or test services was accredited by an accredited body recognized by the ILAC MRA encompassing ISO/IEC-17025:2005 or 2017, "General Requirements for the Competence of Testing and Calibration Laboratories".

ITEM A20-52

- For procurement of calibration services, the published scope of accreditation for the calibration laboratory covers the needed measurement parameters, ranges and uncertainties.
- 3) For procurement of testing services, the published scope of accreditation for the test laboratory covers the needed testing services including test methodology and tolerances/uncertainty.
- 4) The "NR" Certificate Holder's purchase documents shall include:
 - Service provided shall be in accordance with their accredited ISO/IEC-17025:2005 or 2017 program and scope of accreditation;
 - b. As-found calibration data shall be reported in the certificate of calibration when items are found to be out-of-calibration;
 - Standards used to perform calibration shall be identified in the certificate of calibration;
 - d. Notification of any condition that adversely impacts the laboratories ability to maintain the scope of accreditation;
 - e. Any additional technical and/or quality requirements, as necessary, which may include tolerances, accuracies, ranges, and standards; and
 - f. Service suppliers shall not subcontract services to any other supplier.
- 5) The "NR" Certificate Holder shall upon receipt inspection, validate that the laboratory documentation certifies that:
 - Services provided by the laboratory has been performed in accordance with their ISO/IEC-17025:2005 or 2017 program and performed within their scope; and
 - b. Purchase order requirements have been met.
- n) Handling, Storage, and Shipping

The provisions of ASME NQA-1, Part 1, and Requirement 13 shall apply.

o) Quality Assurance Records

The provisions identified in ASME NQA-1, Part 1, Requirement 17, shall apply, except Paragraphs 400, 500, and 600 are not applicable. The following requirements shall be followed:

- Records shall be identifiable and retrievable;
- 2) Records shall be retained consistent with the owners requirements for duration, location and assigned responsibility;
- 3) Forms NR-1 and NVR-1 as applicable shall be completed by the "NR" Certificate Holder upon completion of all repair/replacement activities. Completion of forms, registrations and stamping of the "NR" symbol stamp shall meet the requirements of NBIC Part 3, Section 5. A log shall be maintained in accordance with NBIC Part 3, 5.6;
- 4) Lifetime and non-permanent records shall be as specified in ASME Section III, NCA-4134, Tables NCA-4134.17-1, and 4134.17-2;

- Radiographs (digital images or film) may be reproduced provided that:
 - The process shall be subject to owner's approval;
 - The "NR" Certificate Holder is responsible for the process used and shall include a system for controlling and monitoring the accuracy so that the image will provide the same information as the original; and
 - Procedures shall contain requirements for exposure scanning, focusing, contrast, resolution and distinguishing film artifacts as applicable for reproduced images.
- Records shall be classified, maintained and indexed and shall be accessible to the owner, owner's designee, and the Authorized Nuclear Inspector; and
- When the "NR" Certificate Holder is the owner, designated records and reports received by the owner, shall be filed and maintained in a manner to allow access by the Authorized Nuclear Inservice Inspector. Suitable protection from deterioration and damage shall be provided by the owner. All records and reports shall be retained as specified in the owners QAP for the lifetime of the component or system.

Corrective Action

The provisions identified in ASME NQA-1, Part 1, Requirement 16 shall apply.

- Measures shall be established to ensure that conditions adverse to quality such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and other non-conformances are promptly identified and corrected.
- In the case of significant conditions adverse to quality, the measures shall also ensure that the cause of these conditions be determined and corrected to preclude repetition. The identification of significant conditions adverse to quality, the cause, condition, and the corrective action taken shall be documented and reported to the appropriate levels of management.
- 3) These requirements shall also extend to the performance of subcontractors' corrective action measures.
- Inspection or Test Status (not to include operating status)

The provisions identified in ASME NQA-1, Part 1, Requirement 14 shall apply. Measures shall be established to indicate inspection and test status of parts, items, or components during the repair/ replacement activity. The system used shall provide positive identification of the part, item, or component by means of stamps, labels, routing cards, or other acceptable methods. The system shall include any procedures or instructions necessary to achieve compliance. Procedures shall be provided for the identification of acceptable and unacceptable items and for the control of status indicators. The authority for application and removal of status indicators shall also be specified.

Nonconforming Materials or Items

The provisions identified in ASME NQA-1, Part 1, Requirement 15 shall apply. Measures shall be established to control materials or items that do not conform to requirements to prevent their inadvertent use, including measures to identify and control the proper installation of items and to preclude nonconformance with the requirements of these rules These measures shall include procedures for identification, documentation, segregation when practical, and disposition. Nonconforming items shall be reviewed for acceptance, rejection, or repair in accordance with documented procedures. The responsibility and authority for the disposition of nonconforming items shall be defined. Repaired or replaced items shall be re-examined in accordance with the applicable procedures. Measures that control further processing of a nonconforming or defective item, pending a decision on its disposition, shall be established and maintained. Ultimate disposition of nonconforming items shall be documented.

s) Audits

The provisions identified in ASME NQA-1, Part 1, and Requirement 18 shall apply and shall include the following:

ITEM A20-52

A comprehensive system of planned and periodic audits of the "NR" Certificate Holder's Quality Assurance Program shall be performed. Audit frequency shall be specified in the organization's Quality Assurance Manual. Audits shall be conducted at least annually (within 12 months) for any ongoing code activity to verify compliance with Quality Assurance Program requirements, performance criteria and to determine the effectiveness of the Quality Assurance Program. When no code work has been performed, the required annual audit need only include those areas of responsibility required to be continually maintained such as training, audits, organizational structure, and Quality Assurance Program revisions. The Quality Assurance Manual shall as a minimum describe the following:

- 1) Audits shall be performed in accordance with written procedures or checklists by qualified audit personnel not having direct responsibility in areas being audited:
- 2) Audit personnel shall be qualified in accordance with the current requirements of ASME NQA-1:
- 3) Audit results shall be documented and reviewed by responsible management for adequacy and effectiveness of the quality assurance program:
- Requirements for follow-up actions shall be specified for any deficiencies noted during the audit;
- Audit records and applicable documentation shall be made available to the Authorized Nuclear Inspection Agency for review; and
- Audit records shall include as a minimum;
 - Written procedures;
 - Checklists; b.
 - Reports;
 - Written replies; and d.
 - Completion of corrective actions.

Performance of Authorized Inspection Agency audits required by ASME QAI-1 and NB-263, RCI-1 shall be addressed in the Quality Assurance Manual.

Authorized Nuclear Inspector

Measures shall be taken to reference the commissioned rules for National Board Authorized Nuclear Inspector, in accordance with NB-263, RCI-1 Rules for Commissioned Inspectors. The "NR" Certificate Holder shall ensure that the latest documents including the Quality Assurance Manual, procedures and instructions are made available to the Authorized Nuclear Inspector. The Authorized Nuclear Inspector shall be consulted prior to the issuance of a repair/replacement plan by the "NR" Certificate Holder in order that the Authorized Nuclear Inspector may select any in-process inspection or hold points when performing repair/replacement activities. The "NR" Certificate Holder shall keep the Authorized Nuclear Inspector informed of progress of the repair/replacement activity so that inspections may be performed. The Authorized Nuclear Inspector shall not sign Form NR-1 or Form NVR-1, as applicable, unless satisfied that all work carried out is in accordance with this Section. The Authorized Nuclear Inspector and Authorized Nuclear Inspector Supervisor shall have access to areas where work is being performed including subcontractors facilities in order to perform their required duties. The ANI shall be involved in dispositions and verification for non-conformances and corrective actions involving quality or code requirements.

u) Exhibits

Forms and exhibits referenced in the Quality Assurance Manual shall be explained in the text and included as part of the referencing document or as an appendix to the Quality Assurance Manual. Forms shall be controlled and identified to show the latest approved revision, name, and other corresponding references as stated in the Quality Assurance Manual.

1.6.7 QUALITY ASSURANCE PROGRAM REQUIREMENTS FOR CATEGORY 2 ACTIVITIES

1.6.7.1 SCOPE

Revise to read: ASME Section XI Division 1

2021

rganizations other than owners shall have a written Quality Assurance Program meeting one of the criteria specified in Table 1.6.2 of this section. Organizations applying for a Category 2 "NR" *Certificate of Authorization* shall specify in their written Quality Assurance Program which program criteria their Quality Assurance Program follows. Owners shall have a Quality Assurance Program meeting the requirements of either 10 CFR 50, Appendix B or NQA-1 Part 1 and shall include the additional requirements specified in ASME Section XI, IWA-4142 when applicable. Organizations other than the owner shall comply with requirements specified in either 10 CFR 50, Appendix B supplemented as needed with the owner's QAP; NQA-1 Part 1; or NCA-4000. Organizations may elect to choose to follow all the rules specified in one of the allowed QAP criteria specified in Table 1.6.2 or they may elect to combine or supplement requirements from other specified QAP's. When organizations elect to combine QAP requirements, it shall be clearly specified and understood in the QAM which QAP requirement is being followed for each activity specified in their QAM. The following quality elements shall be specified and described within the QAM.

(21) 1.6.7.2 QUALITY PROGRAM ELEMENTS

a) Organization

The authority and responsibility for individuals involved in activities affecting quality shall be clearly established and documented throughout the Quality Assurance Program and identified on a functional organizational chart contained within the QA Manual.

- b) Statement of Policy and Authority shall:
 - 1) identify the titles of individuals who have the authority and responsibility charged with ensuring the quality program is implemented as described;
 - 2) confirm their freedom in the organization to identify quality problems and to initiate, recommend and provide solutions;
 - include a statement that if there is a disagreement in the implementation of the quality assurance program, the matter is to be referred for resolution to a higher authority and shall be resolved in a manner that will not conflict with code, jurisdiction/regulatory authority or quality program requirements;
 - 4) include a statement of the full support of management; and
 - 5) be dated and signed by a senior management official within the organization.
- c) Quality Assurance Program (QAP)
 - Qualification of non-destructive examination personnel shall be as required by the code or as specified in the owner's Quality Assurance Program.

2) Prior to returning an item to service, the owner shall evaluate the suitability of the item subjected to the repair/replacement activity. Corrective actions shall be taken when an item is determined to be deficient or does not satisfy the requirements of this section.

ITEM A20-52

- The "NR" Certificate Holder shall provide a copy of the Quality Assurance Manual to the owner for review and acceptance. The "NR" Certificate Holder shall make a current controlled copy of the Quality Assurance Manual available to the Authorized Nuclear Inspector and Authorized Nuclear Inspector Supervisor. When a repair/replacement activity is split between the owner and an "NR" Certificate Holder, each Quality Assurance Program shall comply with this section for their respective activities. The owner shall establish interfaces for assuring this section is met for the two Quality Assurance Programs.
- The "NR" Certificate Holder shall be responsible for advising the Authorized Nuclear Inspection Agency of proposed changes to the Quality Assurance Manual to obtain acceptance of the Authorized Nuclear Inspector Supervisor before putting such changes into effect. The Certificate Holder shall be responsible for notifying the Authorized Nuclear Inspector of QAM changes, including evidence of acceptance by the Authorized Nuclear Inspector Supervisor.
- The Quality Assurance Manual need not be in the same format or sequential arrangement as the requirements in these rules as long as all applicable requirements have been covered.
- The "NR" Certificate Holder shall implement and maintain a program for qualification, indoctrination, training and maintaining proficiency of personnel involved with quality functions, including personnel of subcontracted services.
- The "NR" Certificate Holder shall address in their QAM the requirements for interfacing with the owner specified in 1.6.9 of this section.
- Specified controls including responsibilities for personnel shall be described in the quality assurance program.

Design Control

- 1) Repair/replacement activities, code edition and addenda used shall correspond with the owner's Inservice Inspection Program unless later code editions and addenda have been accepted by the owner, the Enforcement and/or the Regulatory authority having jurisdiction at the plant site.
- 2) The repair/replacement plan (see NBIC Part 3, 1.6.7.2 j)) shall identify expected life of the item when less than the intended life as specified in the owner's requirements and the owner shall be advised of the condition.

Revise to read: ASME Section XI Division 1

- R" Certificate Holder shall assure that specifications, drawings, procedures and instructions do not conflict with the owner's requirements. A system must be described in the Quality Assurance Manual to resolve or eliminate such conflicts. Resolution shall consider the design specification requirements, as well as, the owner Requirements, Jurisdictional and Regulatory requirements as applicable.
- ASME Section XI establishes that the owner is responsible for design in connection with repair/ replacement activities. The "NR" Certificate Holder must ensure that the design specification, drawings, or other specifications or instructions furnished by the owner satisfy the code edition and addenda of the owner's requirements. To satisfy this requirement, the "NR" Certificate Holder shall establish requirements that correctly incorporate the owner's requirements into their specifications, drawings, procedures, and instructions, which may be necessary to carry out the work. The "NR" Certificate Holder's system shall include provisions to ensure that the appropriate quality standards are specified and included in all quality records. These records shall be reviewed for compliance with the owner's requirements and the requirements of ASME Section XI.

Revise to read: ASME Section XI Division 1

Section XI Division 1

e) Procurement Document Control

Revise to read: ASME Section XI Division 1

Procurement documents shall require suppliers to provide a Quality Assurance Program consistent with the applicable requirements of ASME Section III, NCA and this section. Documents for procurement of materials, items, and subcontracted services shall include requirements to the extent necessary to ensure compliance with the owner's requirements and IWA-4000 of ASME Section XI. To the extent necessary, procurement documents shall require suppliers to maintain a Quality Assurance Program consistent with the applicable requirements of the edition and addenda of the code of construction to which the items are constructed. Measures shall be established to ensure that all purchased material, items, and services conform to these requirements.

f) Instructions, Procedures, and Drawings

Repair/replacement plans and any verification of acceptability (evaluations) shall be subject to review by Jurisdiction and Regulatory Authorities having jurisdiction at the plant site. Activities affecting quality shall be prescribed by documented instructions, procedures or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative and qualitative criteria for determining that activities affecting quality have been satisfactorily accomplished. The "NR" Certificate Holder shall maintain a written description of procedures, instructions, or drawings used by the organization for control of quality and examination requirements detailing the implementation of the Quality Assurance Program requirements. Copies of these procedures shall be readily available to the Authorized Nuclear Inspector and Authorized Nuclear Inspector, as applicable.

g) Document Control

The program shall include measures to control the issuance, use, and disposition of documents, such as specifications, instructions, procedures, and drawings, including changes thereto. These measures shall ensure that the latest applicable documents, including changes, are reviewed for adequacy and approved for release by authorized personnel and distributed for use at the location where the prescribed activity is performed.

Revise to read: ASME

h) Control of Purchased Material, Items, and Services

Purchase of materials and small products shall meet the requirements specified in ASME Section XI, IWA 4142. Measures shall be established to ensure that purchased material, items, and services conform to the owner's requirements and applicable edition and addenda of the code of construction and ASME Section XI. These measures shall include identification for material traceability. Provisions shall be identified for source evaluation and objective evidence shall be provided evidencing quality standards for material examination upon receipt.

Revise to read: ASME Section XI Division 1

tion and Control of Items

- 1) Measures shall be established for identification and control of material and items, including partially fabricated assemblies. These measures shall ensure that identification is maintained and traceable, either on the material or component, or on records throughout the repair/replacement activity. These measures shall be designed to prevent the use of incorrect or defective items and those which have not received the required examinations, tests, or inspections.
- 2) Identification for traceability shall be applied using methods and materials that are legible and not detrimental to the component or system involved. Such identification shall be located in areas that will not interfere with the function or quality aspects of the item.
- 3) Certified Material Test Reports shall be identified as required by the applicable material specification in ASME Section II and shall satisfy any additional requirements specified in the original code of construction. The Certified Material Test Report or Certificate of Compliance need not be duplicated for submission with compliance documents when a record of compliance and satisfactory reviews

of the Certified Material Test Report and Certificate of Compliance is provided. Quality documents shall provide a record that the Certified Material Test Report and Certificate of Compliance have been received, reviewed, and found acceptable. When the "NR" Certificate Holder authorizes a subcontracted organization to perform examinations and tests in accordance with the original code of construction, the "NR" Certificate Holder shall certify compliance either on a Certified Material Test Report or Certificate of Compliance that the material satisfies the original code of construction requirements.

ITEM A20-52

Control of Processes

- 1) The "NR" Certificate Holder shall operate under a controlled system such as process sheets, checklists, travelers, plans or equivalent procedures. Measures shall be established to ensure that processes such as welding, nondestructive examination, and heat treating are controlled in accordance with the rules of the applicable section of the ASME Code and are accomplished by qualified personnel using qualified procedures.
- Process sheets, checklists, travelers, or equivalent documentation shall be prepared, including the document numbers and revisions to which the process conforms with space provided for reporting results of completion of specific operations at checkpoints of repair/replacement activities.
- Examinations, Tests, and Inspections

Revise to read: ASME Section XI Division 1

- 1) A repair/replacement plan shall be prepared in accordance with the Quality Assurance Program whenever repair/replacement activities are performed. As a minimum, the repair/replacement plan shall include the requirements specified in ASME Section XI, IWA-4150.
- 2) In-process and final examinations and tests shall be established to ensure conformance with specifications, drawings, instructions, and procedures which incorporate or reference the requirements and acceptance criteria contained in applicable design documents. Inspection, test and examination activities to verify the quality of work shall be performed by persons other than those who performed the activity being examined. Such persons shall not report directly to the immediate supervisors responsible for the work being examined.
- 3) Process sheets, travelers, or checklists shall be prepared, including the document numbers and revision to which the examination or test is to be performed, with space provided for recording results.
- Mandatory hold/inspection points at which witnessing is required by the "NR" Certificate Holder's representative or the Authorized Nuclear Inspector/Authorized Nuclear Inservice Inspector shall be indicated in the controlling documents. Work shall not proceed beyond mandatory hold/inspection points without the consent of the "NR" Certificate Holder's representative or the Authorized Nuclear Inspector/Authorized Nuclear Inservice Inspector, as applicable.

Test Control I)

- 1) Testing shall be performed in accordance with the owner's written test procedures or procedures acceptable to the owner, that incorporate or reference the requirements and acceptance criteria contained in applicable design documents.
- Test procedures shall include provisions for ensuring that prerequisites for the given test have been met, that adequate instrumentation is available and used, and that necessary monitoring is performed. Prerequisites may include calibrated instrumentation, appropriate equipment, trained personnel, condition of test equipment, the item to be tested, suitable environmental conditions, and provisions for data acquisition.
- Test results shall be documented and evaluated to ensure that test requirements have been satisfied.

2021

m) Control of Measuring and Test Equipment

The "NR" Certificate Holder may utilize calibration and test activities performed by subcontractors when surveys and audits are performed. As an alternative to performing a survey and audit for procuring Laboratory Calibration and Test Services, the "NR" Certificate Holder as documented in their Quality Program may accept accreditation of an International Calibration and Test Laboratory Services by the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement (MRA) provided this alternative method is described in the "NR" Certificate Holder's Quality Program and the following requirements are met:

ITEM A20-52

- 1) The "NR" Certificate Holder shall review and document verification that the supplier of calibration or test services was accredited by an accredited body recognized by the ILAC MRA encompassing ISO/IEC-17025:2005 or 2017, "General Requirements for the Competence of Testing and Calibration Laboratories":
- 2) For procurement of calibration services, the published scope of accreditation for the calibration laboratory covers the needed measurement parameters, ranges and uncertainties;
- 3) For procurement of testing services, the published scope of accreditation for the test laboratory covers the needed testing services including test methodology and tolerances/uncertainty;
- 4) The "NR" Certificate Holder's purchase documents shall include:
 - Service provided shall be in accordance with their accredited ISO/IEC-17025:2005 or 2017 program and scope of accreditation;
 - As-found calibration data shall be reported in the certificate of calibration when items are found to be out-of-calibration;
 - Standards used to perform calibration shall be identified in the certificate of calibration;
 - d. Notification of any condition that adversely impacts the laboratories ability to maintain the scope of accreditation:
 - Any additional technical and/or quality requirements, as necessary, which may include tolerances, accuracies, ranges, and standards; and
 - f. Service suppliers shall not subcontract services to any other supplier.
- 5) The "NR" Certificate Holder shall upon receipt inspection, validate that the laboratory documentation certifies that:
 - Services provided by the laboratory has been performed in accordance with their ISO/IEC-17025:2005 or 2017 program and performed within their scope; and
 - b. Purchase order requirements have been met.
- n) Handling, Storage, and Shipping

Measures and controls shall be established to maintain quality requirements for handling, storage, and shipping of parts, materials, items, and components.

o) Quality Assurance Records

Revise to read: ASME Section XI Division 1

Documentation, reports and records shall be in accordance with ASME Section XI, IWA-6000.

1) The owner is responsible for designating records to be maintained. Measures shall be established for the "NR" Certificate Holder to maintain these records [see NBIC Part 3, 1.6.7.2.0) 2)] required for Quality Assurance of repair/replacement activities. These shall include documents such as records

of materials, manufacturing, examination, and test data taken before and during repair/replacement activity. Procedures, specifications, and drawings used shall be fully identified by pertinent material or item identification numbers, revision numbers, and issue dates. The records shall also include related data such as personnel qualification, procedures, equipment, and related repairs. The "NR" Certificate Holder shall take such steps as may be required to provide suitable protection from deterioration and damage for records while in his care. Also, it is required that the "NR" Certificate Holder have a system for correction or amending records that satisfies the owner's requirements. These records may be either the original or a reproduced, legible copy and shall be transferred to the owner upon request.

ITEM A20-52

- Records to be maintained as required in NBIC Part 3, 1.6.7.2 o) 1) above shall include the following, as applicable:
 - An index that details the location and individual responsible for maintaining the records;
 - Manufacturer's Data Reports, properly executed, for each replacement component, part, appurtenance, piping system, and piping assembly, when required by the design specification or the owner; Revise to read: ASME
 - Section XI Division 1 The required as-constructed drawings certified as to correctness;
 - Copies of applicable Certified Material Test Reports and Certificates of Compliance;
 - As-built sketch(es) including tabulations of materials repair/replacement procedures, and instructions to achieve compliance with ASME Section XI;
 - Nondestructive examination reports, including results of examinations, shall identify the name and certification level of personnel interpreting the examination results. Final radiographs shall be included where radiography has been performed. Radiographs may be microfilmed or digitally reproduced in accordance with the requirements listed in ASME Section V, Article 2, Mandatory Appendix VI. The accuracy of the reproduction process shall be verified and monitored for legibility, storage, retrievability and reproduction quality;
 - Records of heat treatments may be either the heat treatment char Section XI Division 1 tion of heat treatment time and temperature data certified by the "NR" Certificate Holder. Heat treatments performed by the material manufacturer to satisfy requirements of the material specifications may be reported on the Certified Material Test Report; and
 - Nonconformance reports shall satisfy IWA-4000 of ASME Section XI and shall be reconciled by the owner prior to certification of the Form NR-1 or NVR-1, as applicable.
- After a repair/replacement activity, all records including audit reports required to verify compliance with the applicable engineering documents and the "NR" Certificate Holder's Quality Assurance Program, shall be maintained at a place mutually agreed upon by the owner and the "NR" Certificate Holder. The "NR" Certificate Holder shall maintain records and reports for a period of five years after completion of the repair/replacement activity.
- When the "NR" Certificate Holder is the owner, designated records and reports received by the owner, shall be filed and maintained in a manner to allow access by the Authorized Nuclear Inservice Inspector. Suitable protection from deterioration and damage shall be provided by the owner. These records and reports shall be retained as specified in the owners QAP for the lifetime of the component or system.
- The original of the completed Form NR-1 or Form NVR-1, as applicable, shall be registered with the National Board and, if required, a copy forwarded to the Jurisdiction where the nuclear power plant is located. A log shall be maintained in accordance with NBIC Part 3, 5.6.

Copyright 2021 by The National Board of Boiler and Pressure Vessel Inspectors, distributed for the exclusive use of Allen Roberts

p) Corrective Action

- Measures shall be established to ensure that conditions adverse to quality such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and other nonconformances are promptly identified, controlled and corrected.
- In the case of significant conditions adverse to quality, the measures shall also ensure that the cause of these conditions be determined and corrected to preclude repetition. The identification of significant conditions adverse to quality, the cause, condition, and the corrective action taken shall be documented and reported to the appropriate levels of management.
- 3) Corrective action requirements shall also extend to the performance of subcontractors' activities.
- q) Inspection or Test Status (not to include operating status)

Measures shall be established to indicate examination and test status of parts, items, or components during the repair/replacement activity. The system used shall provide positive identification of the part, item, or component by means of stamps, labels, routing cards, or other acceptable methods. The system shall include any procedures or instructions necessary to achieve compliance. Also, measures shall be provided for the identification of acceptable and unacceptable items. They shall also include procedures for control of status indicators, including the authority for application and removal of status indicators.

r) Nonconforming Materials or Items

- 1) Measures shall be established to control materials or items that do not conform to specified requirements to prevent their inadvertent use, including measures to identify and control the proper installation of items and to preclude nonconformance with the requirements of these rules. These measures shall include procedures for identification, documentation, segregation, and disposition. Nonconforming items shall be reviewed for acceptance, rejection, or repair in accordance with documented procedures. The responsibility and authority for the disposition of nonconforming items shall be defined. Repaired/replaced or altered items shall be re-examined in accordance with the applicable procedures.
- Measures that control further processing of a nonconforming or defective item, pending a decision on its disposition, shall be established and maintained. Ultimate disposition of nonconforming items shall be documented.

s) Audits

A comprehensive system of planned and periodic audits of the "NR" Certificate Holder's Quality Assurance Program shall be performed. Audit frequency shall be specified in the organization's Quality Assurance Manual. Audits shall be conducted at least annually (within 12 months) to verify compliance with Quality Assurance Program requirements, performance criteria and to determine the effectiveness of the Quality Assurance Program. When no code work has been performed, the required annual audit need only include those areas of responsibility required to be continually maintained such as training, audits, organizational structure, Quality Assurance Program revisions, etc. The Quality Assurance Manual shall as a minimum describe the following:

- 1) Audits shall be performed in accordance with written procedures or checklists by qualified audit personnel not having direct responsibility in areas being audited;
- 2) Audit personnel shall be qualified in accordance with the current requirements of NQA-1;
- Audit results shall be documented and reviewed by responsible management for adequacy and effectiveness of the quality assurance program;
- 4) Requirements for follow-up actions for any deficiencies noted during the audit;

5) Audit records and applicable documentation shall be made available to the Authorized Nuclear Inspection Agency for review; and

ITEM A20-52

- Audit records shall include as a minimum:
 - written procedures;
 - b. checklists:
 - reports; C.
 - written replies; and d.
 - completion of corrective actions.

Performance of Authorized Inspection Agency audits required by ASME QAI-1 and NB-263, RCI-1 shall be addressed in the Quality Assurance Manual.

Authorized Nuclear Inspector

Measures shall be taken to reference the commissioned rules for National Board Authorized Nuclear Inspector, in accordance with NB-263, RCI-1 Rules for Commissioned Inspectors. The "NR" Certificate Holder shall ensure that the latest documents including the Quality Assurance Manual, procedures and instructions are made available to the Authorized Nuclear Inspector. The Authorized Nuclear Inspector shall be consulted prior to the issuance of a repair/replacement plan by the "NR" Certificate Holder in order that the Authorized Nuclear Inspector may select any in process inspection or hold points when performing repair/replacement activities. The "NR" Certificate Holder shall keep the Authorized Nuclear Inspector informed of progress of the repair/replacement activity so that inspections may be performed. The Authorized Nuclear Inspector shall not sign Form NR-1 or Form NVR-1, as applicable, unless satisfied that all work carried out is in accordance with this section. The Authorized Nuclear Inspector and Authorized Nuclear Inspector Supervisor shall have access to areas where work is being performed including subcontractors facilities in order to perform their required duties. The ANI shall be involved in dispositions and verification for nonconformances and corrective actions involving quality or code requirements.

Exhibits

Forms and exhibits referenced in the Quality Assurance Manual shall be explained in the text and included as part of the referencing document or as an appendix to the Quality Assurance Manual. Forms shall be controlled and identified to show the latest approved revision, name, and other corresponding references as stated in the Quality Assurance Manual.

1.6.8 **QUALITY ASSURANCE PROGRAM REQUIREMENTS FOR CATEGORY 3 ACTIVITIES**

1.6.8.1 **SCOPE**

Organizations requesting a Category 3 "NR" Certificate of Authorization may elect to follow the requirements specified in ASME NQA-1 Part 1 or follow specific Quality Assurance Program requirements outlined in other specified standards as required by the owner, Regulatory Authority or Jurisdiction. Organizations shall specify in the QAM what QAP requirements are followed. When standards other than ASME NQA-1 are followed, the organization shall have available a copy of that standard for review by the NB Survey Team and the ANIA, as applicable. Each organization shall, as a minimum, include in their written QAM the specified elements listed in Category 1 and/or 2 (1.6.6, 1.6.7) QAP requirements. Additional requirements, as specified within NBIC Part 3, 1.6.8 and 1.6.9 shall be included within the QAP. Also, limitations or additions to ASME NQA-1, as specified for Category 1 or 2 may be incorporated and referenced within the QAM.

(21) 1.6.8.2 QUALITY PROGRAM ELEMENTS

a) Organization

The authority and responsibility for individuals involved in activities affecting quality shall be clearly established and documented throughout the Quality Assurance Program and identified on a functional organizational chart contained within the QA Manual.

- b) Statement of Policy and Authority shall:
 - identify the titles of individuals who have the authority and responsibility charged with ensuring the quality program is implemented as described;
 - 2) confirm their freedom in the organization to identify quality problems and to initiate, recommend and provide solutions;
 - include a statement that if there is a disagreement in the implementation of the quality assurance program, the matter is to be referred for resolution to a higher authority and shall be resolved in a manner that will not conflict with code, jurisdiction/regulatory authority or quality program requirements;
 - 4) include a statement of the full support of management; and
 - 5) be dated and signed by a senior management official within the organization.

c) QAP

The quality assurance program shall be documented by written policies, procedures and instructions. It shall account for special controls, processes, test equipment, tools and skills to obtain quality and for verification of quality by inspections and tests. Indoctrination, training and maintaining proficiency of personnel effecting quality shall be described. The status, adequacy and effectiveness of the QAP shall be regularly reviewed by management. The scope shall be included within the written QAM. The "NR" Certificate Holder shall make a current controlled copy of the Quality Assurance Manual available to the Authorized Nuclear Inspector and Authorized Nuclear Inspector Supervisor. The "NR" Certificate Holder shall address in their QAM the requirements for interfacing with the owner specified in 1.6.9 of this section. Specified controls including responsibilities for personnel shall be described in the quality assurance program.

d) Design Control

Established measures to assure applicable quality standards and regulatory requirements are accurately specified and translated into design documents. Any deviations shall be identified and controlled. Control measures (such as review, approval, release, distribution and revisions) for suitability of materials, parts, equipment, procedures, instructions and processes, shall be performed to ensure adherence to specified design basis requirements. Qualifications, responsibilities and certifications of design personnel shall be clearly defined within the quality assurance program.

e) Procurement Document Control

Documents for procurement of material, equipment and services shall ensure regulatory requirements, design bases and other quality requirements are included or referenced. Procurement documents shall require contractors or subcontractors provide a Quality Assurance Program consistent with the provisions specified herein. Controls necessary to ensure materials, equipment, and services meet specified design criteria shall be clearly described within the quality assurance program.

Instructions, Procedures, and Drawings

Activities affecting quality shall be accomplished in accordance with prescribed instructions, procedures or drawings and shall include appropriate quantitative or qualitative acceptance criteria to determine activities are satisfactorily accomplished.

ITEM A20-52

Document Control

Shall define measures to control the preparation, issuance, use, review approval, revisions and distribution of all documents, including procedures, instructions and drawings related to quality. Responsibilities shall be described within the quality program.

Control of Purchased, Materials, Items and Services

Purchased material, items and services shall conform to the procurement documents. Measures shall be established for source evaluation and selection, objective evidence of quality, inspections at the source and examination of products upon delivery. Effectiveness of quality of suppliers shall be assessed by the applicant or designee at specified intervals. Documented evidence shall be performed and made available to assure materials and services conform to procurement documents, quality procedures and instructions.

Identification and Control of Items

Specified controls shall ensure only correct and acceptable items, parts and components are used and installed and traceable to required documents such as certified material test reports, certificates of conformance, or data reports. These controls shall include traceability on the items or on records traceable to the items during fabrication and final acceptance and test.

j) Control of Processes

Documents used to control processes shall be prepared, including the document numbers and revision to which the process conforms and shall include space for providing reporting of results of specific operations at checkpoints of repair/replacement activity, and provide spaces for signatures, initials, stamps and dates for activities performed by the Certificate Holders' representative and the Authorized Nuclear Inspector. Special processes including welding, nondestructive examinations, heat treating, and bending are performed using qualified and approved procedures and qualified personnel in accordance with applicable codes, standards and other specified criteria.

Examinations, Tests, and Inspections

A repair / replacement plan, developed in accordance with Table 1.6.9, shall address all required information for performing examinations, tests and inspections including but not limited to:

- 1) Establishing hold points;
- Identifying procedures, methods, acceptance criteria;
- 3) Defects identified, removal methods, welding, brazing, fusing, and material requirements, reference points used for identification; and

4) Evaluations of results

Examinations, tests and inspections shall be performed using trained and qualified personnel. Personnel records for qualification and training shall be available for review.

Test Control

Tests shall be performed using written procedures identifying prerequisites, acceptance limits, calibration, equipment, personnel qualifications, environmental conditions, and required documentation. Personnel responsibilities shall be described for performance, acceptance/inspection and documenting results.

m) Control of Measuring and Test Equipment

NATIONAL BOARD INSPECTION CODE

The "NR" Certificate Holder may utilize calibration and test activities performed by subcontractors when surveys and audits are performed. As an alternative to performing a survey and audit for procuring Laboratory Calibration and Test Services, the "NR" Certificate Holder as documented in their Quality Program may accept accreditation of an International Calibration and Test Laboratory Services by the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement (MRA) provided this alternative method is described in the "NR" Certificate Holder's Quality Program and the following requirements are met:

- 1) The "NR" Certificate Holder shall review and document verification that the supplier of calibration or test services was accredited by an accredited body recognized by the ILAC MRA encompassing ISO/IEC-17025:2005 or 2017, "General Requirements for the Competence of Testing and Calibration Laboratories";
- For procurement of calibration services, the published scope of accreditation for the calibration laboratory covers the needed measurement parameters, ranges and uncertainties;
- For procurement of testing services, the published scope of accreditation for the test laboratory covers the needed testing services including test methodology and tolerances/uncertainty;
- The "NR" Certificate Holder's purchase documents shall include:
 - Service provided shall be in accordance with their accredited ISO/IEC-17025:2005 or 2017 program and scope of accreditation;
 - b. As-found calibration data shall be reported in the certificate of calibration when items are found to be out-of-calibration;
 - Standards used to perform calibration shall be identified in the certificate of calibration;
 - Notification of any condition that adversely impacts the laboratories ability to maintain the scope of accreditation:
 - Any additional technical and/or quality requirements, as necessary, which may include tolerances, accuracies, ranges, and standards; and
 - Service suppliers shall not subcontract services to any other supplier.
- The "NR" Certificate Holder shall upon receipt inspection, validate that the laboratory documentation certifies that:
 - Services provided by the laboratory has been performed in accordance with their ISO/IEC-17025:2005 or 2017 program and performed within their scope; and
 - Purchase order requirements have been met.
- n) Handling, Storage, and Shipping

Processes or procedures shall be established to prevent damage, deterioration or misuse of material, items or components used and stored. Controls for handling, shipping, storage, cleanliness and preservation shall be specified in the quality program.

- Records
 - 1) All quality related records shall be classified, identified, verified, maintained, distributed retrievable, and accessible. When the "NR" Certificate Holder is the owner, designated records and reports

received by the owner, shall be filed and maintained in a manner to allow access by the Authorized Nuclear Inservice Inspector (ANII). Suitable protection from deterioration and damage shall be provided by the owner. These records and reports shall be retained as specified in the owner's QAP for the lifetime of the component or system. Records to support evidence of activities affecting quality shall include as applicable:

ITEM A20-52

- Inspections and acceptance criteria/results; a.
- b. Tests performed and supporting reports:
- Procedures/instructions: C.
- Qualification of personnel, procedures, and equipment; d.
- Types of observations and results;
- Audits; f.
- Nonconformances; and
- Corrective actions.
- The original of the completed Form NR-1 or Form NVR-1, as applicable, shall be registered with the National Board and, if required, a copy forwarded to the Jurisdiction where the nuclear power plant is located. A log shall be maintained in accordance with NBIC Part 3, 5.6.

Corrective Action

- 1) Measures shall be established to ensure that conditions adverse to quality such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and other nonconformances are promptly identified and corrected.
- In the case of significant conditions adverse to quality, the measures shall also ensure that the cause of these conditions be determined and corrected to preclude repetition. The identification of significant conditions adverse to quality, the cause, condition, and the corrective action taken shall be documented and reported to the appropriate levels of management.
- 3) Corrective action requirements shall also extend to the performance of subcontractors' activities.
- Inspection or Test Status

Measures shall be established to indicate inspection and test status of parts, items or components during repair/replacement activity. Measures shall include identification, procedures, control indicators (acceptable, unacceptable) and responsibility of personnel.

Nonconforming Material or Items

Measures to control material or items, nonconforming to specified criteria shall be established. Measures shall include identifying, controlling, documenting, reviewing, verifying, dispositioning and segregation when practical.

Audits s)

> A comprehensive system of planned and periodic audits of the "NR" Certificate Holder's Quality Assurance Program shall be performed. Audit frequency shall be specified in the organization's Quality Assurance Manual. Audits shall be conducted at least annually (within 12 months) to verify compliance with Quality Assurance Program requirements, performance criteria and to determine the effectiveness of the Quality Assurance Program. When no code work has been performed, the required annual audit need only include those areas of responsibility required to be continually maintained such as training,

audits, organizational structure, Quality Assurance Program revisions, etc. The Quality Assurance Manual shall as a minimum describe the following:

- 1) Audits shall be performed in accordance with written procedures or checklists by qualified audit personnel not having direct responsibility in areas being audited;
- 2) Audit personnel shall be qualified in accordance with recognized standards, such as NQA-1;
- Audit results shall be documented and reviewed by responsible management for adequacy and effectiveness of the quality assurance program;
- 4) Requirements for follow-up actions for any deficiencies noted during the audit;
- Audit records and applicable documentation shall be made available to the Authorized Nuclear Inspection Agency for review;
- 6) Audit records shall include as a minimum:

NATIONAL BOARD INSPECTION CODE

- a. written procedures;
- b. checklists;
- c. reports;
- d. written replies; and
- e. completion of corrective actions.

Performance of Authorized Inspection Agency audits required by ASME QAI-1 and NB-263, RCI-1 shall be addressed in the Quality Assurance Manual.

t) Authorized Nuclear Inspector

Qualifications and duties shall be as specified in ASME QAI-1 and NB-263, RCI-1 for the Authorized Inspection Agencies, Authorized Nuclear Inspector and the Authorized Nuclear Inspector Supervisor. Additional requirements are specified in NBIC Part 3, 1.6.6.2 s), 1.6.7.2 s), and 1.6.9.

u) Exhibits

Quality related forms and exhibits described in the Quality Assurance Program shall be identified, controlled and where applicable included as a reference document within the QAM or referenced procedures.

1.6.9 INTERFACE WITH THE OWNER'S REPAIR/REPLACEMENT PROGRAM (FOR CATEGORIES 1, 2, AND 3 AS APPLICABLE)

Revise to read: ASME Section XI Division 1

bwner's repair/replacement program shall meet the following:

- a) The "NR" Certificate Holder's repair/replacement plan (see Table 1.6.9) shall be subject to the acceptance of the owner and the owner's Authorized Nuclear Inservice Inspector (ANII) and shall be subject to review by the Jurisdiction and Regulatory Authorities having jurisdiction at the plant site.
- b) Repair/Replacement activities of nuclear components shall meet the requirements of ASME Section III, ASME Section XI, and/or other applicable standard, and the owner's requirements, and shall be subject to verification by the Jurisdiction and Regulatory Authorities having jurisdiction at the plant site.
- c) Documentation of the repair/replacement activities of nuclear components shall be recorded on the Report of Repair/Replacement Activities of Nuclear Components and Systems for Nuclear Facilities, Form NR-1, or Report of Repair/Replacement Activities for Nuclear Pressure Relief Devices, Form NVR-1, in accordance with the NBIC Part 3, Section 5. The completed forms shall be signed by a

representative of the "NR" Certificate Holder and the Authorized Nuclear Inspector when the repair/replacement activity meets the requirements of this section. For repair/replacement activities that involve design changes, Form NR-1, or Form NVR-1, as applicable, shall indicate the organization responsible for the design or design reconciliation in accordance with the owner's requirements.

ITEM A20-52

- d) The "NR" Certificate Holder shall provide a copy of the signed Form NR-1 or Form NVR-1, as applicable, to the owner, the Enforcement, and the Regulatory Authority if required, and the Authorized Nuclear Inspection Agency. The original Form NR-1 or Form NVR-1, as applicable, shall be registered with the National Board by the "NR" Certificate Holder. A NB registration log shall be maintained by the "NR" Certificate Holder. See NBIC Part 3, Section 5.5 and 5.6.
- e) The "NR" Certificate Holder shall provide a nameplate/stamping for repair/replacement activities for each nuclear component unless otherwise specified by the owner's Quality Assurance Program. The required information and format shall be as shown in NBIC Part 3, Section 5.



PROPOSED REVISION OR ADDITION

Item No.: 21-02

Subject Title: Define "Fuel Loading" as it pertains to NR activities.

NBIC Location:

Part 3 Repairs and Alterations: 1.6.2 a)

Project Manager and Task Group:

Raymond Spuhl, NR TG

Source Name and Email:

Terrence Hellman, thellman@nationalboard.org

Statement of Need:

The NR TG would like to clarify "Fuel Loading" as used to determine Category 1, 2 or 3 NR activities.

Background Information:

Existing Text:

1.6.2 a)

1) Category 1

Any ASME Section III Code certified item or system requiring repair/replacement activities irrespective of physical location and installation status prior to fuel loading.

2) Category 2

After fuel loading, any item or system under the scope of ASME Section XI requiring repair/replacement activities irrespective of physical location. Based on regulatory or jurisdictional acceptance, Category 2 may be used prior to fuel loading.

3) Category 3

Items other than those covered by Category 1 or Category 2, requiring repair/replacement activities irrespective of physical location, installation status and fuel loading.

Proposed Text:

1.6.2 a)

1) Category 1

Any ASME Section III Code certified item or system requiring repair/replacement activities irrespective of physical location and installation status prior to fuel loading not under the scope of ASME Section XI.

2) Category 2

After fuel loading, aAny item or system under the scope of ASME Section XI requiring repair/ replacement activities irrespective of physical location under the scope of ASME Section XI- bBased on regulatory or jurisdictional requirements

acceptance, Category 2 may be used prior to fuel loading.

3) Category 3

<u>Any iltem or system</u>, other than those covered by Category 1 or Category 2, requiring repair/replacement activities irrespective of physical location, installation status and fuel loading.



OF BOILER AND PRESSURE VESSEL INSPECTORS

PROPOSED REVISION OR ADDITION

Item No.
21-37
Subject/Title
Parts used in NR activities
NBIC Location
Part: Repairs and Alterations & Repairs and Alterations; Section: 5; Paragraphs: 5.2.5 & 5.2.6
Project Manager and Task Group
Robert Wielgoszinski
Source (Name/Email)
TG NR Committee generated
Statement of Need
Action Item 21-37 is proposing revisions/additions to Part 5 regarding completion of the Forms NR-1 and NVR-1. Particularly including provision to assure that parts or items meeting ASME Code and reported on appropriate ASME Forms are certified by an Inspector holding the proper endorsements. That is the N, I, and/or C endorsements.as appropriate.
Background Information
Current text in the NBIC does not specify any special rules for parts or other items to be used in NR work. This change will assure that any work performed on parts or other items to be used in NR activities is inspected and certified by an appropriate ANI, ANII, or ANI-C
Existing Text
Proposed Text
See attached proposal

	VOTE:						
COMMITTEE	Appr oved	Disapproved	Abs taine d	Not Voting	Passed	Faile d	Date

2021

(MDSC), or BTU/hr (W) heating capacity, the new MRRC shall be documented on Form R-2 and indicated on the appropriate nameplate of NBIC Part 3, Figure 5.7.5-b or NBIC Part 3, Figure 5.7.5-c.

- a) Final preparation of Form R-2, including gathering and attaching supporting reports, shall be the responsibility of the "R" Certificate Holder that performed the construction portion of the alteration. The construction organization shall complete the Form R-2 provided by the design organization, including the "Construction Certification" section of the form. An Inspector shall indicate that the work complies with the applicable requirements of this code by completing and signing the "Certificate of Inspection" section of the form. When no construction work is performed (e.g., a re-rating with no physical changes), the "R" Certificate Holder responsible for the design shall prepare the Form R-2, including gathering and attaching of supporting documentation.
- b) The following shall be attached to and become a part of completed Form R-2:
 - 1) For ASME boilers and pressure vessels, a copy of the original Manufacturer's Data Report, when available:
 - 2) Form R-3, Report of Parts Fabricated by Welding, Manufacturer's Partial Data Reports, or Certificates of Compliance, if applicable; and
 - 3) For other than ASME, the manufacturer's reports (i.e., reports required by the original code of construction, etc.), when available.

5.1.1 (21)PREPARATION OF FORM R-3 REPORT OF PARTS FABRICATED BY WELDING

Using the instructions found in Table S9.4 of Supplement 9, preparation of Form R-3 shall be the responsibility of the "R" Certificate Holder responsible for performing the work.

(21)5.1.2 PREPARATION OF FORM R-4 REPORT SUPPLEMENT SHEET

Using the instructions found in Table S9.5 of Supplement 9, preparation of Form R-4 shall be the responsibility of the "R" Certificate Holder responsible for performing the work.

(21)5.1.3 PREPARATION OF FORM NR-1, REPORT OF REPAIR/REPLACEMENT **ACTIVITIES FOR NUCLEAR FACILITIES**

Using the instructions found in Table S9.6 of Supplement 9, preparation of Form NR-1 shall be the responsibility of the "NR" Certificate Holder responsible for performing the work.

- a) Using the instructions found in Table S9.6 of Supplement 9, preparation of Form NR-1 shall be the (21)responsibility of the "NR" Certificate Holder performing the repair.
 - b) Information describing the scope of work used to repair a pressure-retaining item (PRI) shall be doc umented on a Form NR-1 and extended to a Form R-4 as needed to fully describe the repair activities completed per the instructions in Table S9.6 of Supplement 9.
 - c) An Inspector holding appropriate endorsements shall indicate acceptance by signing Form NR-1, and Form R-4, if attached.
 - d) The Form R-3, Report of Parts Fabricated by Welding, Manufacturer's Data Reports, and Certificates of Compliance described in this section shall be a part of the completed Form NR-1 and shall be attached thereto. Parts or items fabricated by welding to ASME shall be reported on the appropriate ASME Data Report Form, certified by an Authorized Nuclear Inspector holding the appropriate endorsements and attached to the Form NR-1.

Ρ

R

Ε

Ρ

Α

0

Ν

0

F

F

0

R M

N V

R

NB 21-37 Parts used in NB work 01/13/2022 2 of 2

Attachment 14 - Page 3 of 3

5.2.6 PREPARATION OF REPORT OF REPAIR/REPLACEMENT ACTIVITIES FOR NUCLEAR PRESSURE RELIEF DEVICES

Ring the instructions found in Table S9.7 of Supplement 9, preparation of Form NVR-1 shall be the responsibility of the "NR" Certificate Holder, possessing the "VR" Certificate denoting the repair of nuclear pressure relief valves, responsible for performing the work.

- a) Using the instructions found in Table S9.7 of Supplement 9, preparation of Form NVR-1 shall be theresponsibility of the "NR" Certificate Holder, possessing the "VR" Certificate denoting the repair of nuclear pressure relief valves, responsible for performing the repair.
- b) Information describing the scope of work used to repair a pressure-retaining item (PRI) shall be documented on a Form NVR-1 and extended to a Form R-4 as needed to fully describe the repair activities completed per the instructions in Table S9.7 of Supplement 9.
- c) An Inspector holding appropriate endorsements shall indicate acceptance by signing Form NVR-1, and Form R-4, if attached.
- d) The Form R-3, *Report of Parts Fabricated by Welding*, Manufacturer's Data Reports, and Certificates of Compliance described in this section shall be a part of the completed Form NVR-1 and shall be attached thereto. Parts or items fabricated by welding to ASME shall be reported on the appropriate ASME Data Report Form, certified by an Authorized Nuclear Inspector holding the appropriate endorsements and attached to the Form NVR-1.

5.2 DISTRIBUTION OF FORM R-1

- a) Legible copies of completed Form R-1, together with attachments, shall be distributed to the owner or user and Jurisdiction, if required, and shall be provided to the Inspector and the inservice Authorized Inspection Agency of the pressure retaining item upon request.
- Distribution of Form R-1 and attachments shall be the responsibility of the organization performing the repair.

SUPPLEMENT 6

REPAIR, ALTERATION, AND MODIFICATION OF DOT TRANSPORT (CARGO) TANKS

S6.1 SCOPE

This supplement provides requirements and guidelines for repairs, alterations, or modifications to DOT Transport Tanks used for the transportation of dangerous goods via highway, rail, air, or water.

S6.2 DEFINITIONS

The definitions specified in NBIC Part 3, Section 9, *Glossary*, shall be used in conjunction with those specified in NBIC Part 2, S6.17. Where conflicts between definitions exist, those identified in NBIC Part 2, S6.17 shall take precedence.

S6.3 CONSTRUCTION STANDARDS

When the standard governing the original construction is the ASME Code or other regulations of the Competent Authority, repairs, alterations, or modifications shall conform, insofar as possible, to the edition of the construction standard or specification most applicable to the work. Where this is not possible or-practical practicable, it is permissible to use other codes, standards or specifications, including the ASME Code provided the "R" Certificate Holder has the concurrence of the Inspector and, if required, the Competent Authority.

S6.4 ACCREDITATION AND REGISTRATION

Organizations performing repairs, alterations, or modifications shall be accredited in accordance with the National Board "R" Accreditation Program. In addition repair organizations performing repairs, alterations, or modifications to transport tanks shall be registered with DOT as required by 49 CFR Part 180.

S6.5 AUTHORIZATION

The Inspector's authorization to perform a repair, alteration, or modification shall be obtained prior to initiation of the work to be performed on a transport tank. Additional requirements are specified in NBIC Part 3, 1.3.1 and 1.3.2.

S6.6 INSPECTION

Inspection and certification shall be made by an Inspector holding an appropriate National Board Commission as required by NBIC Part 3, 1.3.

S6.7 MODIFICATIONS

All modifications, as defined in NBIC Part 2, Supplement 6, to the pressure-retaining item shall meet the requirements of NBIC Part 3 for alterations.

S6.8 DRAWINGS AND CALCULATIONS

- a) Design requirements for repairs, alterations and modifications shall comply with the requirements of NBIC Part 3, 3.2.4.
- b) As appropriate, drawings or instructions shall be prepared to describe the repair, alteration, or modification. Drawings shall include sufficient information to satisfactorily perform the activity.

Formatted: Indent: Left: 0"

c) The design of alterations and modifications shall be completed by an organization experienced in the design portion of the standard used for the construction of the item and certified by a Design Certifying Engineer as defined in NBIC Part 2, S6.17. Design documents shall be completed prior to the start of any physical work and be available for review by the Inspector accepting the design.

S6.95 MATERIALS

The materials used in making repairs, alterations, or modifications shall conform to the original code of construction including the material specification requirements. Carbon or alloy steel having a carbon content content of more than 0.35% (0.30% for ton tanks) shall not be welded unless permitted by the original code of construction. The "R" Certificate Holder is responsible for verifying the identification of existing materials from original data, drawings, or unit records and identification of the material to be installed. Materials that have previously been in service, as described in Part 3, 3.2.1 c), are not permitted for alterations or modifications of DOT Transport Tanks per 49 CFR Part 180. Additional material requirements are provided in NBIC Part 3, Section 3.

S6.6-10 REPLACEMENT PARTS

Replacement parts to be used in repairs, alterations, and modifications of DOT Transport Tanks shall comply with the requirements provided in NBIC Part 3, 3.2.2.

- a) Replacement parts that will be subject to internal or external pressure that consist of new material which may be formed to the required shape by spinning, forging, die forming, and on which no fabrication welding is performed shall be supplied as material. Such parts shall be marked with the material and part identification and the name or trademark of the parts manufactured. In lieu of full identification marking on the material or part, the part manufacturer may use a coded marking system traceable to the original marking. Such markings shall be considered as the part manufacturer's certification that the part complies with the original code of construction. Examples include seamless or welded tube or pipe, forged nozzles, heads or subassemblies attached mechanically.
- Replacement parts that will be subject to internal or external pressure, that are preassembled by attachment welds, shall have the welding performed in accordance with the original code of construction. This certificate shall be supplied in the form of a bill of material or drawings with statement of certification.
- b) Replacement parts subject to internal or external pressure fabricated by welding that require shop inspection by an Authorized Inspector shall be fabricated by an organization having an appropriate ASME Certificate of Authorization. The item shall be inspected and stamped as required by the applicable section of the ASME Code and DOT specification requirements. A completed ASME Manufacturer's Partial Data Report shall be supplied by the manufacturer.
- b) When the original code of construction is other than ASME, replacement parts subject to internal or external pressure fabricated by welding shall be manufactured by an organization certified as required by the original code of construction. The item shall be inspected and stamped as required by the original code of construction. Certification as required by the original code of construction shall be supplied with the item. When this is not possible or practicable the organization fabricating the part may have a National Board Certificate of Authorization. Replacement parts fabricated by an "R" stamp holder shall be documented on Form R-3 and the "R" Stamp applied as described in NBIC Part 3, \$6.15.

S6.7 AUTHORIZATION

Formatted: Font: 10 pt, Not Bold

The Inspector's written authorization to perform a repair, alteration, or modification shall be obtained prior to initiation of the work to be performed on a transport tank. Additional requirements are specified in NBIC Part 3–1.3.1 and 1.3.2.

S6.8 INSPECTION

Inspection and certification shall be made by an Inspector holding an appropriate National Board Commission as required by NBIC Part 3, 1.3 and shall be a Registered Inspector meeting the requirements of the Competent Authority.

S6.8.1 INSPECTOR DUTIES FOR REPAIRS, ALTERATIONS, AND MODIFICATIONS

- a) Inspectors performing repair, alteration, or modification inspections under the requirements of this supplement shall satisfy the requirements of S6.8.1 to be authorized to sign the Form R-1, Repairs and Form R-2. Alterations.
- b) For repairs, alterations, and modifications of transport tanks, the duties of the Registered Inspector performing inspections are detailed in Part 2, S6.10 through S6.15, as required by the Competent Authority.
- The Registered Inspector shall meet the rules of NB-263, RCI-1, Rules for Commissioned Inspectors.

 Additional duties are summarized below:
- Verify the organization performing the repair, alteration or modification activity is properly accredited
 and in possession of a current valid Certificate of Authorization to apply the "R" Stamp issued by the
 National Board and is working to an accepted Quality Control System;
- Verify that the design, if required, for the modification of the vessel is approved by a Design Certifying Engineer, or Designated Approval Agency or other applicable individual;
- 1) Verify the materials to be used to make the repair, alteration, or modification are approved for use and comply with applicable code requirements;
- 1) Verify the welding procedures and welders or welding operators are properly qualified;
- 1) Verify that all heat treatments, if required, including PWHT have been performed in accordance with the applicable standards and that the results are acceptable;
- Verify that all NDE, impact tests, and other tests have been performed when required, and that they
 are acceptable;
- Make a visual inspection of the work performed to confirm there are no visible defects or deviations from code requirements;
- Perform external and internal visual inspections, if the vessel is equipped with a manway, and witness the hydrostatic or pneumatic pressure test and/or leak tightness test when they are required;
- 1) Verify the correct nameplate is properly attached to the vessel and that the current test and inspection markings are properly attached and displayed on the proper vessel;
- 1) Sign the Form R-1 and, as appropriate, form R-2 when work is completed.

S6.9-11 WELDING

<u>Welding, including procedure specification qualification, performance qualification, qualification records, qualified personnel identification, continuity of qualified personnel, and process continuity
</u>

Formatted: Left, Indent: Left: 0", Right: 0.24", Outline numbered + Level: 1 + Numbering Style: a, b, c, ... + Start at: 1 + Alignment: Left + Aligned at: 0.08" + Indent at: 0.33"

<u>records</u> shall be <u>performed</u> in accordance with the requirements of the original code of construction used for the fabrication of the pressure <u>vessel retaining item and Part 3, Section 2</u>.

- a)b) For hydrogen control when low alloy steel filler metals are used, the filler metal classification shall include an H4 supplemental diffusible hydrogen designator (maximum 4 ml [H2]/100 g deposited metal) for each of the following welding processes:
 - 1) electrodes for shielded metal arc welding (SMAW) conforming to SFA-5.5;
 - 2) electrodes and fluxes for submerged arc welding (SAW) conforming to SFA-5.26;
 - 3) electrodes and rods for gas shielded metal arc welding (GMAW) conforming to SFA-5.28;
 - 4) electrodes for flux-cored arc welding (FCAW) conforming to SFA 5.29.
- Practices used for controlling storage and exposure of filler metals shall be those developed by the "R" Certificate Holder or those recommended by the filler metal manufacturer.

b)

S6.9.1 WELDING PROCEDURE SPECIFICATION

Welding shall be performed in accordance with a Welding Procedure Specification (WPS) qualified in accordance with the original code of construction. When this is not possible or practicable, the WPS may be qualified in accordance with ASME Section IX.

S6.9.2 STANDARD WELDING PROCEDURE SPECIFICATIONS

A "R" Certificate Holder may use one or more applicable Standard Welding Procedure Specifications shown in NBIC Part 3, 2.3 without supporting Procedure Qualification Records (PQRs) since SWPS are pre-qualified and the PQR will not be supplied.

S6.9.3 PERFORMANCE QUALIFICATION

Welders or welding operators shall be qualified for the welding processes that are used. Such qualification shall be in accordance with the requirements of the original code of construction or ASME Section IX. Use of Standard Welding Procedures Specification shown in NBIC Part 3.2.3 is permitted for performance qualification testing.

S6.9.4 WELDING RECORDS

The "R" Certificate Holder shall maintain a record of the results obtained in welding procedure qualification, except for those qualifications for which the provisions of NBIC Part 3, \$6.8.2 are used and of the results obtained in welding performance qualifications. These records shall be certified by the "R" Certificate Holder and shall be available to the inspector.

S6.9.5 WELDERS' IDENTIFICATION

The "R" Certificate Holder shall establish a system for the assignment of a unique identification mark to each welder/welding operator qualified in accordance with the requirements of the NBIC. The "R" Certificate Holder shall also establish a written procedure whereby all welded joints can be identified as to the welder or welding operator who made them. This procedure shall use one or more of the following methods and be acceptable to the Inspector. The welder's or welding operator's identification mark may be stamped (low stress stamp) adjacent to all welded joints made by the individual or, in lieu of stamping, the "R" Certificate Holder may keep a record of the welded joints and the welders or welding operators used in making the joint.

Formatted: Indent: Left: 0.31", No bullets or numbering

Formatted: Font color: Gray-87.5%

Formatted: Indent: Left: 0.1", Right: 0", Space Before: 0 pt, Line spacing: single, No bullets or numbering

Formatted: Right: 0.08", Space After: 0 pt, Line spacing: Multiple 1.04 li

Formatted: Justified, Right: 0.08", Line spacing: Multiple 1.04 li

Formatted: List Paragraph, Numbered + Level: 1 + Numbering Style: a, b, c, ... + Start at: 1 + Alignment: Left + Aligned at: 0.25" + Indent at: 0.5"

S6.9.6 WELDERS' CONTINUITY

The performance qualification of a welder or welding operator shall be affected when one of the following conditions occurs:

- When the welder or welding operator has not welded using a specific process during a period of six months or more, their qualifications for that process shall expire;
- a) When there is specific reason to question their ability to make welds that meet the specification, the qualification which supports the welding that is being performed shall be revoked. All other qualifications not questioned remain in effect.

S6.10-12 HEAT TREATMENT

S6.4012.1 PREHEATING

Preheating may be employed during <u>welding use of a process</u> to assist in completion of the <u>welded-joint Preheating shall comply with the requirements in NBIC Part 3, 2.5.1.</u> (see <u>NBIC Part 3, 2.5.1</u>). The need for and the temperature of preheat are dependent on a number of factors such as chemical analysis, degree of restraint of the items being joined, material thickness, and mechanical properties of the base metals being joined. The <u>Welding Procedure Specification for the material being welded shall specify the preheat temperature requirements.</u>

S6.4012.2 POSTWELD HEAT TREATMENT (PWHT)

Postweld heat treatment may used in repairs, alterations, and modifications of DOT Transport Tanks shall comply with the requirements provided in NBIC Part 3, 2.5.2. be performed as required by the original code of construction in accordance with a written procedure. The procedure shall contain the parameters for postweld heat treatment. Local PWHT that is not specified by the original code of construction may be performed in accordance with an Alternative Postweld Heat Treatment Method described in NBIC Part 3, 2.5.2 with acceptance by the Inspector and required by the Competent Authority.

S6.4012.3 ALTERNATIVES TO POSTWELD HEAT TREATMENT

- a) Under certain conditions, postweld heat treatment in accordance with the original code of construction may be inadvisable or impractical. In such instances, alternative methods of postweld heat treatment or special welding methods in accordance with NBIC Part 3, 2.5.3, and acceptable to the Inspector and Competent Authority may be used.
- b) When the standard governing the original construction is the Code of Federal regulation for DOT/MC 331 cargo tanks for propane, butane, anhydrous ammonia, and other DOT permitted commodities, and the tanks are made to the ASME Code, Section VIII, Division 1, Part UHT, repairs, alterations, or modifications shall conform insofar as possible, to the edition of the construction standard or specification most applicable to the work. Where this is not possible or practicable, it is permissible to use other codes, standards, or specifications provided the "R" Certificate Holder has the concurrence of the DOT. Shells and heads of MC 331 cargo tanks were made from quenched and tempered alloy steel plate, SA517, Grade E (originally Code Case 1298) and Grade F (originally Code Case 1204) prior to 1994.

Formatted: Right: 0.08", Space Before: 0 pt

c) The 1994 ASME Code Addenda revised UHT-5(b) to permit the joining of UHT materials to UCS or UHA materials in head and shell sections. Propane, butane, and anhydrous ammonia are the most common transported commodities and the shipper is required by DOT to comply with certain composition limitations. Propane and butane transported must have sufficiently low hydrogen sulfide content so as not to exceed the limitations for Classification One of the ASTM D1838-74 copper strip test, and the anhydrous ammonia transported must be inhibited with a minimum water content of 0.2% by weight. In addition, such cargo tanks made for propane, butane, and anhydrous ammonia service must be postweld heat treated, unless specifically exempted by a DOT special permit that exempts PWHT.

S6.13 REPAIRS OF DEFECTS

- a) Before a repair is made to a defect in a welded joint or base metal, care should be taken to investigate its cause and to determine its extent and likelihood of recurrence. This information shall be made available to the Inspector.
- b) For MC 330 and MC 331 transport tanks, when a repair is made to defects revealed by the wet fluorescent magnetic particle examination, including those repaired by grinding, the affected area of the cargo tank must again be examined by the wet fluorescent magnetic particle method after hydrostatic testing to assure that all defects have been removed.

S6.44-14 NONDESTRUCTIVE EXAMINATION

- a) The nondestructive examination (NDE) requirements, including qualification of NDE personnel shall comply with the requirements in NBIC Part 3, 4.2., including technique, extent of coverage, procedures, personnel qualification, and acceptance criteria, shall be in accordance with the original code of construction used for the pressure vessel, and repairs, alterations, and modifications shall be subjected to the same nondestructive examination requirements as the original welds. Where this is not possible or practicable, alternative NDE methods acceptable to the Inspector and the Competent Authority may be used on a case-by-case basis.
- b) NOE personnel shall be qualified and certified in accordance with the requirements of the original code of construction. When this is not possible or practicable, NDE personnel may be qualified and certified in accordance with their employer's written practice. ASNT SNT-TC-1A, Recommended Practice for Nondestructive Testing Personnel Qualification and Certification (2006 Edition), or ANSI/ASNT CP-189, Standard for Qualification and Certification of Nondestructive Testing Personnel (2006 Edition), shall be used as a guideline for employers to establish their written practice. The ASNT Central Certification Program (ACCP) may be used to fulfill the examination and demonstration requirements of the employer's written practice. Provisions for training, experience, qualification and certification of NDE personnel shall be described in the "R" Certificate Holder's written quality system.

S6.12 COATINGS AND LININGS

When coatings or linings are to be inspected, such inspections shall be done in accordance with the Structural Steel Painting Council, SSPC publication, No. 91-12, Coating and Lining Inspection Manual.

S6.153 MEASUREMENT, EXAMINATION, AND TEST EQUIPMENT

The calibration of pressure gages, measurement, examination, and test equipment, and documentation of calibration shall be performed, as required, by the applicable standard used for construction. This system shall be documented

Formatted: Font: (Default) Arial, Font color: Gray-87.5%

Formatted: List Paragraph, Indent: Left: 0", Numbered + Level: 1 + Numbering Style: a, b, c, ... + Start at: 1 + Alignment: Left + Aligned at: 0.25" + Indent at: 0.5"

Formatted: Indent: Hanging: 0.5"

Formatted: List Paragraph, Indent: Left: 0", Numbered + Level: 1 + Numbering Style: a, b, c, ... + Start at: 1 + Alignment: Left + Aligned at: 0.25" + Indent at: 0.5"

S6.16 PRESSURE TEST

The following requirements shall apply to all repairs, alterations, or modifications to DOT Transport Tank pressure-retaining items:

- a) The integrity of repairs and replacement parts used in repairs, alterations, or modifications shall be verified by a pressure test;
- b) The "R" Certificate Holder is responsible for all activities relating to the pressure test of repairs, alterations, or modifications;

S6.16.1 PRESSURE TEST METHODS

The integrity of repairs, alterations and modifications of DOT Transport Tanks shall be verified by a pressure test as described below. The test method used shall be subject to acceptance of the Inspector and the Competent Authority, when required.

a) Liquid Pressure Test

Pressure testing of repairs, alterations, and modifications of DOT Transport Tanks shall comply with NBIC Part 3, 4.4.2(a) and the following requirements:

 Liquid pressure tests shall be conducted in accordance with the requirements of the original code of construction and the regulations of the Competent Authority at pressures established in Table S6.16. When original test pressure included consideration of corrosion allowance, the test pressure may be further adjusted based on the remaining corrosion allowance;

TABLE S6.16 PRESSURE TEST REQUIREMENTS

Cargo Tank Specification	<u>Test Pressure</u>
MC 300, MC 301, MC 302, MC 303, MC 305, and MC 306	20.7 kPa (3 psig) or design pressure, whichever is greater
MC 304 and MC 307	275.8 kPa (40 psig) or 1.5 times design pressure, whichever is greater
MC 310, MC 311, and MC 312	20.7 kPa (3 psig) or 1.5 times design pressure, whichever is greater
MC 330 and MC 331	1.5 times either MAWP or the re-rated pressure, whichever is applicable
MC 338	1.25 times either MAWP or the re-rated pressure, whichever is applicable
<u>DOT 406</u>	34.5 kPa (5 psig) or 1.5 times the MAWP, whichever is greater
<u>DOT 407</u>	275.8 kPa (40 psig) or 1.5 times the MAWP, whichever is greater
<u>DOT 412</u>	1.5 times the MAWP

Note: DOT Transport Tanks constructed in accordance with Part UHT in Section VIII, Division 11 of the ASME Code shall be tested at a pressure at least twice the transport tank design pressure.

b) Pneumatic Test

A pneumatic test may be conducted in accordance with the requirements of the original code of construction and the regulations of the Competent Authority at pressures established in Table S6.18.

Formatted: Right: 0.13", Space Before: 9.5 pt

Formatted: No bullets or numbering

Formatted: Indent: Left: 0", Right: 0", Line spacing: single

Concurrence of the owner shall be obtained in addition to that of the Inspector and the Competent Authority, where required. Precautionary requirements of the original code of construction and NBIC Part 2, 6.13.6.1(c) shall be followed.

S6.174 ACCEPTANCE INSPECTION

The Inspector making the acceptance inspection shall be the same Inspector who authorized the repairs, alterations, or modifications. Where this is not possible or <u>practical practicable</u>, another Inspector may perform the acceptance inspection; however, in all cases, the Inspector who performs the acceptance inspection shall be an employee of the same organization as the Inspector who authorized the repairs, alterations, or modifications.

S6.185 GENERAL STAMPING REQUIREMENTS

The stamping of or attaching of a nameplate to a pressure-retaining item shall indicate that the work was performed in accordance with the requirements of this code and any requirements of the Competent Authority. Such stamping or attaching of a nameplate shall be done only with the knowledge and authorization of the Inspector—and Competent Authority. The "R" Certificate Holder responsible for the repair or the construction portion of the modification/alteration shall apply the stamping. For a re-rating where no physical changes are made to the pressure-retaining item, the "R" Certificate Holder responsible for the design shall apply the stamping. Requirements for stamping and nameplate information are shown in NBIC Part 3, Section 5.

S6.185.1 SPECIFIC "R" STAMPING AND NAMEPLATE REQUIREMENTS

The holder of a "R" *Certificate of Authorization* is required to affix a stamping or nameplate on the Transport Tank that indicates, the repair, alteration, or modification has been performed in accordance with the requirements of NBIC Part 3, Supplement 6 and the additional requirements of the code of construction. All repairs, alterations, and modifications, after acceptance by the Registered-Inspector, shall have the "R" Symbol affixed to the stamping or the nameplate. The stamping or nameplate information shall satisfy the requirements of a) thru g) belowNBIC Part 3, 5.7.:

- a) The required data shall be in characters at least 4 mm (5/32 in.) high;
- b) The markings may be produced by casting, etching, embossing, debossing, stamping, or engraving;
- The selected method shall not result in any harmful contamination or sharp discontinuities to the pressure-retaining boundary of the Transport Tank;
- d) Stamping directly on the Transport Tank, when used, shall be done with blunt-nose continuous or blunt-nose interrupted dot die stamps. If direct stamping would be detrimental to the item, required markings and the embossed Code Symbol stamping may appear on a nameplate affixed to the Transport Tank;
- e) The "R" Certificate Holder shall use its full name as shown on the Certificate of Authorization or use an approved abbreviation acceptable to the National Board;
- f) The non-embossed Code Symbol stamping, when directly applied on the item or when a nameplate is used shall be applied adjacent to the original manufacturer's stamping or nameplate. A single repair stamping or nameplate may be used for additional activities performed, provided the repair activity is carried out by the same "R" Certificate Holder;
- g) The date of each repair, alteration, or modification corresponding with the date on the applicable "R" form shall be applied to the exiting stamping or nameplate.

S6.185.2 REMOVAL OF ORIGINAL STAMPING OR NAMEPLATE

Removal of the original stamping or nameplate shall comply with the requirements of NBIC Part 3, 5.11. If it becomes necessary to remove the original stamping, the Inspector shall, subject to the approval of the Competent Authority, witness the making of a facsimile of the stamping, the obliteration of the old stamping, and the transfer of the stamping. When the stamping is on a nameplate, the Inspector shall witness the transfer of the nameplate to the new location. Any relocation shall be described on the applicable NBIC "R" Form. The restamping or replacement of a code symbol stamp shall be performed only as permitted by the governing code of construction.

S6.18.3 REPLACEMENT OF STAMPING OR NAMEPLATE

Replacement of indistinct stamping or lost, illegible, or detached nameplates shall comply with the requirements provided in NBIC Part 2, 5.2.

S6.196 FORM "R" REPORTS "R" FORMS

S6.196.1 DOCUMENTATION OF FORM "R" REPORTS

Repairs, alterations, or modifications that have been performed in accordance with the NBIC shall be documented on Form R-1, *Report of Repair* or Form R-2, *Report of Alteration* as shown in NBIC Part 3, Section 5. Form R-4, *Report Supplementary Sheet*, shall be used to record additional data when space is insufficient on Form R-1 or R-2.

S6.196.2 PREPARATION OF FORM "R" FORMSREPORTS

Preparation of "R" Forms shall be the responsibility of the "R" Certificate Holder performing the repairs, alterations, or modifications and shall comply with the requirements provided in NBIC Part 3, 5.2.1, 5.2.2 and 5.2.4. An Inspector shall indicate acceptance by signing the appropriate "R" form.

S6.1916.3 DISTRIBUTION OF FORM "R" REPORTS

Distribution of Form "R" Reports shall comply with the requirements provided in NBIC Part 3, 5.3 and 5.4, a) Legible copies of the completed "R" forms together with attachments shall be distributed to the owner or user, the Inspection, the Competent Authority as required, the Authorized Inspection Agency responsible for the inspection, and the National Board forregistration.

b) Distribution of the "R" forms and attachments shall be the responsibility of the "R" Certificate Holder per-forming the work.

S6.1916.4 REGISTRATION OF FORM R-1 AND FORM R-2"R" REPORTS

a) Organizations Repair organizations performing repairs, alterations, or modifications required by this supplement shall register such repairs, alterations, or modifications with the National Board, submit the completed "R" Form, meeting the requirements of the NBIC, to the National Board.

Formatted: Font: 10 pt
Formatted: Font: 10 pt
Formatted: Font: 10 pt

Formatted: Right: 0", Line spacing: single

Formatted: Right: 0.2"

Formatted: Font: 10 pt, Not Bold

Formatted: Font: 10 pt, Not Bold

Formatted: Font: 10 pt, Not Bold, Font color: Auto

Formatted: Level 1, Indent: Left: 0", Hanging: 0.75"

Formatted: No bullets or numbering

Formatted: Level 1, Indent: Left: 0", Hanging: 0.75"

- b) The repair organization shall maintain a sequential Form "R" Registration Log Log that shall identify the following: as described in Part 3, 5.6.
 - 1) Form number assigned for Form R-1;
 - 2) Identify if the activity was a repair, alteration, or modification;
 - 3) When the repair, alteration, or modification was completed, and
 - 4) Date sent to the National Board.

S6.17 ADDITIONAL REQUIREMENTS FOR REPAIRS, ALTERATIONS, OR MODIFICATIONS

S6.17.1 SCOPE

This section provides additional requirements for repairs, alterations, or modifications to DOT Transport Tank pressure-retaining items and shall be used in conjunction with NBIC Part 3.

S6.17.2 REPAIRS OF DEFECTS

Before a repair is made to a defect in a welded joint or base metal, care should be taken to investigate its cause and to determine its extent and likelihood of recurrence. This information shall be made available to the Inspector.

S6.17.3 MODIFICATIONS

All modifications to the pressure-retaining item shall meet the requirements of NBIC Part 3 for alterations.

S6.17.4 DRAWINGS

Prawings or instructions shall be prepared to describe the repair, alterations, or modification. Drawings shallinclude sufficient information to satisfactorily perform the activity.

S6.17.5 AUTHORIZATION

Repairs, alterations, or modifications to a pressure-retaining item shall not be initiated without the authorization of the Inspector, who shall determine that the methods are acceptable.

S6.18 EXAMINATION AND TEST

The following requirements shall apply to all repairs, alterations, or modifications to DOT Transport Tank pressure-retaining items:

- The integrity of repairs and replacement parts used in repairs, alterations, or modifications shall be verified by examination and test;
- b) The "R" Certificate Holder is responsible for all activities relating to examination and test of repair, alterations, or modifications:
- Examination and tests to be used shall be subject to acceptance of the Inspector and the Competent Authority when required.

S6.18.1 METHODS

Formatted: Font: (Default) Arial, Font color: Gray-87.5%

Formatted: List Paragraph, Numbered + Level: 1 +
Numbering Style: a, b, c, ... + Start at: 1 + Alignment: Left +
Aligned at: 0.25" + Indent at: 0.5"

Formatted: Level 1, Indent: Left: 0", Hanging: 0.75"

Formatted: Level 1, Indent: Left: 0", Hanging: 0.75", Right: 0", Line spacing: single

One, or a combination of the following examination methods, shall be applied to DOT Transport Tank pressure-retaining items with the concurrence of the Inspector and the Competent Authority when required.

a) Liquid Pressure Test

Pressure testing of repairs shall meet the following requirements:

- Pressure tests shall be conducted using water or other suitable liquid. The test pressure shall be the minimum required to verify the leak tightness integrity of the repair, but not more than 150% of the maximum allowable working pressure (MAWP) stamped on the pressure-retaining item, as adjusted for temperature. When original test pressure included consideration of corrosion allowance, the test pressure may be further adjusted based on the remaining corrosion allowance:
- During a pressure test where the test pressure will exceed 90% of the set pressure of the pressure relief device, the device shall be removed whenever possible. If not possible, a test gag should be used using the valve manufacturer's instructions and recommendations; and
- 3) Hold time for the pressure test shall be a minimum of 10 minutes prior to examination by the Inspector. Where the test pressure exceeds the MAWP of the item, the test pressure shall be reduced to the MAWP for close examination by the Inspector. Hold time for close examination shall be as necessary for the Inspector to conduct the examination.
- b) Pneumatic Test

A pneumatic test may be conducted. Concurrence of the owner shall be obtained in addition to that of the Inspector and the Competent Authority where required. The test pressure shall be the minimum required to verify leak tightness integrity of the repair, but shall not exceed the maximum pneumatic test pressure of the original code of construction. Precautionary requirements of the original code of construction shall be followed.

c) Nondestructive Examination

Nondestructive examination (NDE) may be conducted. NDE methods shall be suitable for providing meaningful results to verify the integrity of the repair.

S6.19 REPAIRS, ALTERATIONS, OR MODIFICATION REPORTS

- When repairs, alterations, or modifications are performed on a transport tank, i.e., cargo tank, portable tank, or ton tank, the owner or User shall have the activity performed by a Repair Organization that has a valid "R" Certificate of Authorization issued by the National Board. "R" forms shall be completed and certified by the "R" Certificate Holder and received and certified by the Inspector.
- b) For the purposes of documentation and stamping, modification shall be considered an alteration.

Formatted: Level 1, Indent: Left: 0", Hanging: 0.75"

Formatted: Level 1, Indent: Left: 0", Hanging: 0.75", Right: 0", Line spacing: single

Formatted: Level 1, Indent: Left: 0", Hanging: 0.75"

Formatted: Level 1, Line spacing: single

Formatted: Level 1, Indent: Left: 0", Hanging: 0.75",

Space Before: 0 pt



OF BOILER AND PRESSURE VESSEL INSPECTORS

PROPOSED REVISION OR ADDITION

Item No.
20-83
Subject/Title
Definition of Nonconformance
NBIC Location
Part: Repairs and Alterations & Repairs and Alterations; Section: 9 & 1.5; Paragraph: Glossary & 1.5.1 s)
Project Manager and Task Group
Source (Name/Email)
Terrence Hellman / thellman@nationalboard.org
Statement of Need
Action Item 19-60 is proposing revisions/additions to all of 1.5.1. This proposal is to move the definition of "Nonconformance" out of the current 1.5.1 s) paragraph and into the glossary.
Background Information
Current text in 1.5.1 s) that is being revised via Action Item 19-60: s) Nonconforming Items There shall be a system acceptable to the Inspector for the correction of nonconformities. A nonconformance is any condition that does not comply with the applicable rules of the NBIC, construction code, jurisdictional requirements, or the quality system. Nonconformance must be corrected or eliminated before the repaired or altered component can be considered in compliance with the NBIC.
Existing Text
Proposed Text
Nonconformance – A condition of product or service in which any characteristics do not conform with the applicable rules of the NBIC, construction code, jurisdictional requirements, or the quality system.

	VOTE:						
COMMITTEE	Appr oved	Disapproved	Abs taine d	Not Voting	Passed	Faile d	Date



PROPOSED REVISION OR ADDITION

Item No.

A 21-12

Subject/Title

Revision to modify Term 'Alteration' and to add Guidance on classifying a Repair vs Alteration

NBIC Location

Part: Repairs and Alterations; Section: Section 3

Project Manager and Task Group

P. Becker (PM), K. Moore, B. Underwood, P. Shanks, S. Chestnut, T. Seime

Source (Name/Email)

Pat Becker, pabecker@babcock.com

Statement of Need

Interpretations continue to be received based on confusion in current guidance given in Section 3, Part 3 of Repairs and Alterations. Of particular issue is the heavily relied upon 'List of Examples' of Repairs and Alterations. The lists are considered a 'shortcut' to understanding which activities should be classified as repairs and which should be alterations. However, the examples are not intended to be used without the understanding of the rest of the subject matter in Part 3, Section 3…nor are they all-inclusive or exclusive.

Experience levels can vary widely among all 'stakeholder' categories, i.e. Owner/User, Authorized Inspector, Certificate Holder, In-Service inspector, Jurisdictional Authority etc.

From the Forward: 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. The NBIC does not contain rules to cover all details of post-construction activities. Where complete details are not given, it is intended that individuals or organizations, subject to the acceptance of the Inspector and Jurisdiction when applicable, provide details for post-construction activities that will be as safe as otherwise provided by the rules in the original code of construction.

The Intent of any effort is to improve the user experience while being cognizant not to overly restrict. The task group is paying attention to industry concerns and suggestions including the potential impact of any changes to existing equipment and installations. Existing Interpretations are being 'walked thru' the decision tree and otherwise reviewed against the addition of any content. The goal is to provide clearer guidance with less conflicting or overlapping examples or information.

Background Information

Update of Part 3 Section 3 to improve User experience and clarify definition of 'Alteration'. Updated 'problematic' example lists to eliminate 'conflicting examples'.

Existing Text

PART 3, SECTION 3 REPAIRS AND ALTERATIONS — REQUIREMENTS FOR REPAIRS AND ALTERATIONS

3.1 SCOPE

This section provides requirements and guidelines for materials, replacement parts, and methods used when performing repairs and alterations to pressure-retaining items. Specific repair or alteration methods for other types of pressure equipment are in NBIC Part 3, Section 6.

3.2 GENERAL REQUIREMENTS FOR REPAIRS AND ALTERATIONS

(21) 3.2.1 MATERIAL REQUIREMENTS FOR REPAIRS AND ALTERATIONS

Proposed Text

PART 3, SECTION 3 REPAIRS AND ALTERATIONS — REQUIREMENTS FOR REPAIRS AND ALTERATIONS

3.0 INTRODUCTION

This Section provides information on the requirements for repairs and alterations to pressure retaining items. Information on how to classify, perform, verify, and document acceptable repair and alteration activities may be found throughout Part 3 Sections and Supplements (Refer to the Table of Contents for detail on the location of relevant information). It is the intent that this Section be used in cooperation with local jurisdictional authorities and with an understanding of the applicable pressure vessel code regulations relevant to the scope of repair or alteration activity. Note that the guidance herein and the examples given are not all inclusive and are intended to be representative of cases and activities commonly considered either a repair or alteration.

3.1 SCOPE

This section provides requirements and guidelines for materials and methods used when performing repairs and alterations to pressure-retaining items. Specific repair or alteration methods for other types of pressure equipment are in NBIC Part 3, Section 6.

3.1.1 CLASSIFICATION OF REPAIRS, ALTERATIONS AND REPLACEMENT PARTS

When repairing, replacing, or altering existing pressure-retaining items, the activity classification (e.g. Repair vs. Alteration) shall be based on the scope of activity to be performed considering input from the Owner/User, Certificate Holder, AIA, and Jurisdictional Authority. When the scope of activity is complex or there is disagreement related to the classification, the Jurisdictional Authority in the location of the final installation of the repaired, altered or replaced equipment shall be considered the authority.

Guidance on determining the activity classification may be found in:

SUPPLEMENT X, CLASSIFYING REPAIRS AND ALTERATIONS
and throughout this section.

SUPPLEMENT X, FIGURE SX.1. DECISION TREE (LOGIC DIAGRAM) FOR DETERMINING REPAIR OR ALTERATION ACTIVITY CLASSIFICATION is based on the rules and guidance shown throughout Part 3, Section 3 and is provided to aid in determining the activity classification.

References to relevant paragraphs may be found following the 'logic' questions throughout the diagram.

Replacement Parts may be considered either a repair or alteration. Examples of replacement parts may be found in 3.2.2. Routine Repairs are limited to those listed in 3.3.2, e), 1) thru 5). Repair and Alteration activity examples may be found in 3.3.3 and 3.3.4.

The scope of the work to be performed will determine the classification type. Note that in all cases, the examples of Replacement parts, Routine Repairs, Repairs and Alterations are not all inclusive and should be used along with education, experience, and sound engineering judgment when determining classification type.

3.2 GENERAL REQUIREMENTS FOR REPAIRS AND ALTERATIONS

9.1 DEFINITIONS

Alteration — A change in the item described on the original Manufacturer's Data Report which affects the pressure containing capability of the pressure-retaining item. (See NBIC Part 3, 3.4.3, Examples of Alteration) Nonphysical changes such as an increase in the maximum allowable working pressure (internal or external), increase in design temperature, or a reduction in minimum temperature of a pressure-retaining item shall be considered an alteration.

9.1 DEFINITIONS

Alteration — A change in the item described on the original Manufacturer's Data Report which decreases the pressure containing capability of the pressure-retaining item. (See NBIC Part 3, 3.4.3, Examples of Alteration) Nonphysical changes such as an increase in the maximum allowable working pressure (internal or external), increase in design temperature,

resulting in change of allowable stress of the material, or a reduction in minimum temperature of a pressure-retaining item shall be considered an alteration.

SUPPLEMENT X
CLASSIFYING REPAIRS AND ALTERATIONS

SX.1 SCOPE

FIGURE SX.1

DECISION TREE (LOGIC DIAGRAM) FOR DETERMINING REPAIR OR ALTERATION ACTIVITY CLASSIFICATION

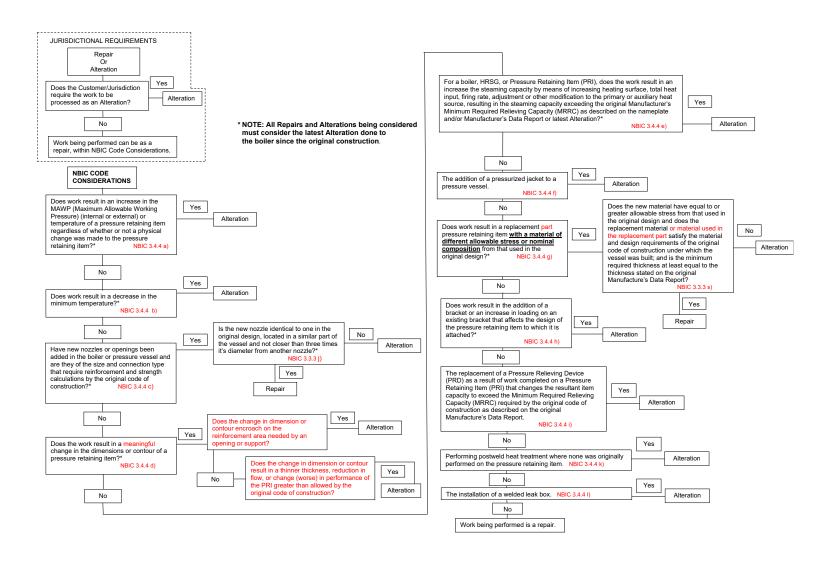
(See Below and Attachment)

	VOTE:						
COMMITTEE	Approved	Disapproved	Abstained	Not Voting	Passed	Failed	Date

SUPPLEMENT X CLASSIFYING REPAIRS AND ALTERATIONS

SX.1 SCOPE

FIGURE SX.1 DECISION TREE (LOGIC DIAGRAM) FOR DETERMINING REPAIR OR ALTERATION ACTIVITY CLASSIFICATION



<u>SUPPLEMENT XX - REPAIR METHODS OF PRESSURE VESSELS AND PIPING EXCLUSIVE TO OIL, GAS, AND CHEMICAL INDUSTRIES</u>

SXX.1 SCOPE

This supplement provides methods for repair of pressure retaining items, outside the boiler setting through the administrative boundary of ASME Section I and IV, exclusive to oil, gas, and chemical manufacturing.

SXX.2 CONSTRUCTION STANDARDS

Repairs shall conform, insofar as possible, to the relevant requirements of the edition of the code of construction. Where this is not practicable, it is permissible to use other codes, standards, or specifications, provided the "R" Certificate Holder has the concurrence of the Inspector and the Jurisdiction, where required.

SXX.3 LIMITATIONS

Repairs will be limited to pressure retaining items, which comply with the following conditions:

- a) Operates at or below 650°F (345°C) for carbon steels or below the time dependent service temperatures for low alloy steel.
- b) Impact testing was not required.
- c) Not used in lethal service.
- d) No environmental or service-related cracking conditions exist, except as provided by NBIC Part 3, 3.3.4.8.

SXX.4 JURISDICTIONAL REQUIREMENTS

Repairs will require notification to the Jurisdiction and where required, Jurisdictional approval prior to performing work.

SXX.5 REPAIR METHODS

a) WELDED LAP PATCH

A welded lap patch is a repair method used to maintain the structural integrity of the pressure retaining item by providing an external boundary over the area exhibiting damage in the form of a "welded lap patch" as described by ASME PCC-2 (i.e. Full Encirclement Steel Reinforcing Sleeves for Piping, Fillet Welded Lap Patches with Reinforcing Plug Welds, or Fillet Welded Lap Patches).

- 1) Welded lap patches shall be further restricted as follows:
 - a. A lap patch installed over an existing lap patch is prohibited.
 - b. The distance between lap patches shall not be less than 2√(Rt) where R is the outside radius of the spherical or cylindrical shell in inches (mm), and t is equal to the nominal wall thickness of the spherical or cylindrical shell in inches (mm).
- Except as required in Part 3, Paragraph SXX.5 a)4)a), ASME PCC-2 shall be used for the design of the welded lap patch and shall be in accordance with the original code of construction, when practicable. Design of a welded lap patch shall consider original design conditions, taking in to account current service conditions and damage mechanisms. Use of this method shall be acceptable to the Inspector and where required, the Jurisdiction and shall be limited to pressure containing equipment owned and operated by an owner or user.
 - a. Lap patch material should be the same (e.g., composition, physical and mechanical properties) to that of the pressure retaining items' original construction. Lap patch material of a different nominal composition and, equal to or greater in allowable stress from that used in the original design, may be

- <u>used provided the material satisfies the requirements of the original code of construction under which the vessel was built.</u>
- 3) The "R" Certificate Holder responsible for the design of the welded lap patch shall ensure a Fitness for Service Assessment (FFSA) has been performed on the area of the item being patched in accordance with NBIC, Part 2, 4.4.1, supporting the continued service of the item. The welded lap patch repair method shall not remain in place beyond the calculated remaining life of the covered portion of the pressure retaining item.
 - a) The remaining life of the pressure retaining item shall be documented on the Form NB-403 in the Remarks section. The Form NB-403 shall be affixed to the Form R-1 and identified in the Remarks section. A National Board Commissioned Inspector holding an "R" endorsement as described in NB-263, RCI-1 shall sign both the Form R-1 and the attached NB-403.
 - b) The thinned or leaking area shall be fully covered, as specified in the FFSA, to the distance where the minimum required metal thickness is verified. Wall thickness shall be verified in the area to be welded.
 - c) A welded lap patch method shall not be used where cracks are present unless the cracks have been removed and repaired in accordance with NBIC Part 3, 3.3.4.2 a) and the condition that led to the crack formation and propagation has been eliminated.
- 4) <u>Hazards associated with welding on degraded components should be addressed with the owner or user by the use of engineering controls, administrative controls and personal protective equipment.</u>
 - a) When the pressure retaining item will remain in service while implementing a welded lap patch, the requirements and limitations described within ASME PCC-2, Part-1 shall be used in conjunction with ASME PCC-2, Part-2.
 - b) <u>API RP-2201, "Safe Hot Tapping Practices in the Petroleum and Petrochemical Industries" may be used as a guideline for identifying hazards associated with welding to a component that is under pressure, including service restrictions.</u>
- 5) Test or examination methods shall be in accordance with NBIC, Part 3, 4.4.1.

SXX.6 Post Repair Inspection

a) After the completion of weld repairs, post repair inspection requirements shall be established in accordance with NBIC Part 3, 3.3.4.8.

SXX.7 Documentation

a) <u>Documentation and distribution requirements for repair methods identified in this supplement are identified in NBIC Part 3, Section 5.</u>

SXX.8 Registration

a) <u>Organizations performing repairs under an "R" stamp program shall register such repairs with the National Board.</u>



THE NATIONAL BOARD OF BOILER AND PRESSURE VESSEL INSPECTORS

PROPOSED REVISION OR ADDITION

Item No.

A21-53

Subject/Title

Supplement 8 Weld and Post Repair Inspection of Creep Strength Enhanced Ferritic Steel Pressure Equipment

NBIC Location

NBIC Part 3 Repairs and Alterations Supplement 8 S8.5 a)

Project Manager and Task Group

Philip Gilston

Source (Name/email)

Mark Kincs / mark.r.kincs@xcelenergy.com

Statement of Need

The requirement for Inspector involvement in post-repair inspections to CSEF weld repairs is to ensure future safe operation of the boiler. This is a function of the in service Authorized Inspection Agency, not the Repair Inspector, whose duties end with completion of repair documentation.

Background Information

The post-repair inspection requirements specified in S8.5 are unique. There is no other mention of such inspections elsewhere in NBIC–Part 3. Presumably, Welding Method 6 repairs don't require post-repair inspection due to the perceived low-level of associated risk (inside the boiler setting).

S8.5 POST REPAIR INSPECTION

- a) After the completion of weld repairs to CSEF steels, post inspection requirements shall be developed and implemented based on acceptance from the Inspector, and if applicable, the Jurisdiction.
- b) Post-repair inspection intervals and methods of examination shall be implemented to ensure safe operation and margin to locate and monitor defect growth in the weld repair area. The selected nondestructive examination method shall provide meaningful results and shall follow NBIC Part 3, Section 4.
- c) Post repair inspection shall be on-going until the component reaches end of life or is replaced. The Owner/User may revise the re-inspection interval based on inspection results from previous inspections.

S8.5 POST REPAIR INSPECTION

- a) After the completion of weld repairs to CSEF steels, post inspection requirements shall be developed and implemented based on acceptance from the <u>Inspectorinservice Authorized Inspection Agency of</u> <u>the pressure retaining item</u>, and if applicable, the Jurisdiction.
- b) Post-repair inspection intervals and methods of examination shall be implemented to ensure safe operation and margin to locate and monitor defect growth in the weld repair area. The selected nondestructive examination method shall provide meaningful results and shall follow NBIC Part 3, Section 4.
- c) Post repair inspection shall be on-going until the component reaches end of life or is replaced. The Owner/User may revise the re-inspection interval based on inspection results from previous inspections.

Item No. :21-53 Rev 00 Page **1** of **2**

	VOTE						
Committee	Approved	Disapproved	Abstained	Not Voting	Passed	Failed	Date

Item No. :21-53 Rev 00 Page **2** of **2**

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 conversions 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.
- c) The use of previous versions of the listed SWPSs is permitted. Previous versions include Amended, Reaffirmed Revised or Superseded SWPSs regardless of the publication date.

TABLE 2.3
SWPS DESIGNATION: YEAR

B2.1-1-001: 2020	B2.1-1-201: 2019	B2.1-8-215: 2012	B2.1-1/8-229: 2013
B2.1-1-002: 2020	B2.1-1-202: 2019	B2.1-8-216: 2012	B2.1-1/8-230: 2013
B2.1-1-016: 2018	B2.1-1-203: 2019	B2.1-4-217: 2021	B2.1-1/8-231: 2015
B2.1-1-017: 2018	B2.1-1-204: 2019	B2.1-4-218: 2021	B2.1-1-232: 2020
B2.1-1-018: 2021	B2.1-1-205: 2019	B2.1-4-219: 2021	B2.1-1-233: 2020
B2.1-1-019: 2018	B2.1-1-206: 2019	B2.1-4-220: 2021	B2.1-1-234: 2020
B2.1-1-020: 2018	B2.1-1-207: 2019	B2.1-4-221: 2021	B2.1-1-235: 2020
B2.1-1-021: 2018	B2.1-1-208: 2019	B2.1-5A-222: 2022	
B2.1-1-022: 2018	B2.1-1-209: 2019	B2.1-5A-223: 2022	
B2.1-8-023: 2018	B2.1-1-210: 2012	B2.1-5A-224: 2022	
B2.1-8-024: 2012	B2.1-1-211: 2012	B2.1-5A-225: 2022	
B2.1-8-025: 2012	B2.1-8-212: 2012	B2.1-5A-226: 2022	
B2.1-1-026: 2018	B2.1-8-213: 2012	B2.1-1/8-227: 2013	
B2.1-1-027: 2018	B2.1-8-214: 2012	B2.1-1/8-228: 2013	

Item 21-80, Replacement of Shell/Heads per 3.3.3(h) Jon Ferriera. Hartford Steam Boiler

3.3.3 Examples of Repairs

- h) Replacement of pressure-retaining parts identical to those existing on the pressure-retaining item and described on the original *Manufacturer's Data Report*. For example:
 - 1) Replacement of furnace floor tubes and/or sidewall tubes in a boiler;
 - 2) Welded or mechanical replacement of a shell or head in accordance with the original design;
 - 3) Rewelding a circumferential or longitudinal seam in a shell or head; and
 - 4) Replacement of nozzles of a size where reinforcement is not a consideration.

Background: There are two conflicting NBIC interpretations relating to mechanical replacement of parts. Interpretation 01-29 states that NBIC neither requires nor prohibits documenting mechanical repair installation on a Form R-1. Recently passed interpretation 19-11 states that mechanical replacement of pressure retaining components in ASME Section VIII, Div. 3 vessels are considered a repair activity. 19-11 cites paragraph 3.3.3 which provides examples of repairs. Paragraph 3.3.3(h)(2) specifically states that replacement of head or shell in accordance with the original design. It does not specify whether head was replaced by welding or mechanical attachment.

Statement of Need: This interpretation and corresponding Code revision would provide clarity to NBIC users and address whether mechanical replacement of these components is considered a repair.



Item No.	
A 22-04	
Subject/Title	
Clarification on Part 3, 3.3.3 s)	
NBIC Location	
Part: Repairs and Alterations; Section: 3.3.3; Paragraph: s)	
Project Manager and Task Group	
Source (Name/Email)	
Tom White / Thomas.white@nrg.com	
Statement of Need	
The paragraph was written for pressure-retaining parts not just vessels	s as stated later in the first sentence.
Background Information	
Researching alteration examples 3.4.4 (g) which states: except as per	mitted in NBIC Part 3, 3.3.3 s);
Existing Text	Proposed Text
s) Replacement of a pressure-retaining part with a material of different nominal composition and, equal to or greater in allowable 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 shall be at least equal to the thickness stated on the original Manufacturer's Data Report;	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 pressure-retaining item was built.

VOTE:						
Approved	Disapproved	Abstained	Not Voting	Passed	Failed	Date
	Approved		Approved Disapproved Abstained			

Item No.	
Subject/Title	
NBIC Location	
Project Manager and TaskGroup	
Source (Name/Email)	
Statement of Need	
Background Information	
Existing Text	
Proposed Text	

	VOTE:						
COMMITTEE	Approved	Disapproved	Abstained	Not Voting	Passed	Failed	Date
SG R&A							
SC R&A							

2021 NATIONAL BOARD INSPECTION CODE

PART 3, SECTION 1 REPAIRS AND ALTERATIONS — GENERAL AND ADMINISTRATIVE REQUIREMENTS

1.1 SCOPE

- This part provides requirements and guidelines that apply when performing repairs and alterations to pressure-retaining items.
- b) The National Board administers four specific accreditation programs:
 - 1) "R" Repairs and Alterations to Pressure-Retaining Items
 - 2) "NR" Repair and Replacement Activities for Nuclear Items
 - 3) "VR" Repairs to Pressure Relief Valves
 - 4) "T/O" Test Only of Pressure Relief Valves
- c) This part describes some of the administrative requirements for the accreditation of repair organizations. Additional administrative requirements can be found in:
 - 1) NB-415, Accreditation of "R" Repair Organizations
 - 2) NB-417, Accreditation of "NR" Repair Organizations
 - 3) NB-514, Accreditation of "VR" Repair Organizations
 - 4) NB-528, Accreditation of "T/O" Test Only Organizations
- d) Requirements for repairs to pressure relief valves can be found in NBIC Part 4.

1.2 CONSTRUCTION STANDARDS FOR PRESSURE-RETAINING ITEMS

- a) RRepairs and alterations shall conform, insefar as possible, to the edition and addenda of the original code of construction, standard, or specification used during the initial fabrication of the pressure-retaining item, or to a later edition and addenda most applicable to the work planned.
- a) When the standard governing the original construction is the ASME Code or ASME RTP-1, repairs and alterations to pressure-retaining items shall conform, insofar as possible, to the section and edition of the ASME Code most applicable to the work planned.
- b) If the pressure-retaining item was not constructed <u>using an original code of construction</u>, <u>standard or specification is unknown</u>, to a construction code or standard, or when the standard governing the original construction is not the ASME Code or ASME RTP-1, repairs or alterations shall conform, insofar as possible, to the edition of the construction standard or specification most applicable to the work. Where this is not possible or practicable, or if the use of the original code of construction, standard, or specification is not possible or practicable, it is permissible to use other codes, standards, or specifications <u>most applicable</u> to the work <u>planned</u>, including the ASME Code or ASME RTP-1, provided the "R" or "NR" Certificate Holder has the concurrence of the Inspector and the Jurisdiction where the pressure-retaining item is installed.
- c) For historical boilers, ASME, Section I provides rules for design and features of construction.
- d) Piping systems are designed for a variety of service conditions such as steam, water, oil, gas, or air. Design requirements for repairs and alterations are to meet the original code of construction or the code most appropriate for the repair or alteration. These systems shall be designed for the most severe conditions of pressure, temperature, loadings, and expected transients considered for normal operation. Allpipe materials, fittings, and valves shall be rated for the maximum service conditions for normal operation. Design corrosion of piping systems should also be considered when determining types of materials ad thicknesses.

1 SECTION 1

Formatted: Font: 10 pt

Formatted: Font: 10 pt

Formatted: Font: 10 pt

PART 3, SECTION 4 REPAIRS AND ALTERATIONS — EXAMINATION AND TESTING

4.1 SCOPE

This section provides requirements and guidelines for performing examinations and tests for repairs and alterations to pressure-retaining items.

(21) 4.2 NONDESTRUCTIVE EXAMINATION

- a) The nNondestructive examination (NDE) requirements_, including technique, extent of coverage, procedures, personnel qualification, and acceptance criteria, shall be in accordance with the original code of construction, standard or specification selected for the repair or alteration of for the pressure-retaining item (see NBIC Part 3, 1.2). Weld repairs and alterations shall be subjected to the same-nondestructive examination requirements as the original welds. Where this is not possible or practicable, alternative NDE methods acceptable to the Inspector and the Jurisdiction where the pressure-retaining item is installed, where required, may be used, provided that all other requirements of this section are met.
- b) NDE personnel shall be qualified and certified in accordance with the requirements of the original code of construction. When this is not possible or practicable, NDE personnel may be qualified and certified in accordance with their employer's written practice. ASNT SNT-TC-1A, Recommended Practice Non-destructive Testing Personnel Qualification and Certification (2006 edition), or ANSI/ASNT CP-189, Standard for Qualification and Certification of Nondestructive Testing Personnel (2006 edition), shall be used as a guideline for employers to establish their written practice. Provisions for training, experience, qualification, and certification of NDE personnel shall be described in the "R" Certificate Holder's written quality system.

4.3 PRESSURE GAGES, MEASUREMENT, EXAMINATION, AND TEST EQUIPMENT

The calibration of pressure gages, measurement, examination, and test equipment, and documentation of calibration shall be performed, as required, by the applicable standard used for construction.

4.4 EXAMINATION AND TEST FOR REPAIRS AND ALTERATIONS

The following requirements shall apply to all repairs and alterations to pressure-retaining items:

- a) The integrity of repairs, alterations, and replacement parts used in repairs and alterations shall be verified by examination or test;
- b) Testing methods used shall be suitable for providing meaningful results to verify the integrity of the repair or alteration. Any insulation, coatings, or coverings that may inhibit or compromise a meaningful test method shall be removed, to the extent identified by the Inspector;
- The "R" Certificate Holder is responsible for all activities relating to examination and test of repairs and alterations:
- d) Examinations and tests to be used shall be subject to acceptance of the Inspector and, where required, acceptance of the Jurisdiction.

4.4.1 TEST OR EXAMINATION METHODS APPLICABLE TO REPAIRS

Based on the nature and scope of the repair activity, one or a combination of the following examination and test methods shall be applied to repairs and replacement parts used in repairs.

SUPPLEMENT 5 GENERAL REQUIREMENTS FOR REPAIRS AND ALTERATIONS TO YANKEE DRYERS S5.1 SCOPE

This supplement provides requirements and guidelines for repairs and alterations to Yankee dryer pressure retaining components and shall be used in conjunction with inspection requirements identified in NBIC Part 2, *Inspection* Supplement 5.

\$5.2 EXAMINATIONS AND TEST METHODS

In addition to the requirements of NBIC Part 3, 4.4.1 and 4.4.2, the following are recommended: The following supplemental examination and test methods may be used in addition to the requirements of NBIC Part 3, 4.4.1.and 4.4.2:

- a) Acoustic emission testing; and
- b) Metallographic examination when thermal damage is suspected due to operational or repair activities.

S5.3 YANKEE DRYER REPAIR METHODS

This supplement provides additional requirements for repair methods to Yankee Dryer pressure-retaining components and shall be used in conjunction with NBIC Part 3, Section 2 through 5 of this part, as appropriate.

S5.3.1 REPLACEMENT PARTS FOR YANKEE DRYERS

- a) Yankee dryer replacement pressure-retaining parts shall be fabricated in accordance with the manufacturer's design and the original code of construction. Yankee dryer pressure-retaining parts may include:
 - 1) shell;
 - heads;
 - 3) center shaft, stay, or trunnion;
 - 4) stay bars;
 - 5) structural bolting; and
 - 6) journals.
- b) Replacement of non_pressure-retaining parts, when different from the manufacturer's design, shall be evaluated for any possible effect on the pressure-retaining parts.

S5.4 REPAIR GUIDE FOR YANKEE DRYERS

a) Welding or brazing shall not be used on any Yankee dryer pressure-retaining component manufactured from cast iron. The *Manufacturer's Data Report* shall be carefully reviewed to determine the material of construction of each Yankee dryer component such as shell, heads, and journals.

b)

weld repairs are permitted on yankee dryer pressure-retaining components manufactured from steel when properly evaluated and completed as described in NBIC Part 3.Weld repairs performed in Formatted: Not Highlight

- accordance with NBIC Part 3 are permitted on yankee dryer pressure-retaining components that are manufactured from steel, except that head bolts may not be welded.
- b)c)Structural deterioration or damage caused by corrosion, thinning, or cracking shall not be repaired until its extent has been determined by suitable nondestructive examination.
- c)d) The user shall have a plan covering the scope of the repair. The plan shall ensure that the work involved is compatible with the original design specification and good engineering practices.
- d)e)All repair work shall be documented.

S5.5 PROCEDURES REPAIRS THAT DO NOT REQUIRE STAMPING OR NAMEPLATE ATTACHMENT

All repair procedures_, shall be acceptable to the Inspector, and when verified by the owner-user to not affect pressure-retaining capability of the Yankee dryer, do not require stamping or nameplate attachment. Examples of repairs that do not require stamping or nameplate attachment are: The following examples of repairs do not require stamping or nameplate attachment provided the repair procedure has been accepted by the Inspector and the owner or user has verified there will be no effect on the pressure retaining capability of the yankee dryer.

- a) Grinding and machining:
 - removal of shell overhung flange;
 - 2)1)removing bolt-stop ring for test specimens;
 - 3)2)head/shell joint corrosion removal;
 - 4)3)journal grinding;
 - 5)4)shell surface grinding (crowning);
 - 6)5)crack removal;
 - 7)6)head flange OD reduction during shell grinding; and
 - 8)7)back spot facing of flange surfaces (head, shell, journal).
- b) Metallizing (full face, spot, edge):
 - 1) applying a metallized coating; and
 - 2) grinding of a metallized coating.
- Epoxy (sealant) repair of steam leaks at bolted joints (using fittings and pumping bolts) and epoxy filling of surface imperfection;
- d) Installation of spoiler bars;
- e) Maintain/repair/replace internal condensate removal system;
- f) Driven plug repair when completed as described in NBIC Part 3, S5.6.3; and
- g) Threaded plug repair when completed as described in NBIC Part 3, S5.6.4.

Formatted: Font: (Default) ArialMT, 10 pt, Font color: Black

Formatted: Indent: Left: 0.5", No bullets or numbering, Adjust space between Latin and Asian text, Adjust space between Asian text and numbers

g)h) Installation of head insulation

S5.6 DAMAGE REPAIR

\$5.6.1 REPAIR OF LOCAL THINNING

- a) A Local Thin Area (LTA) may develop in a pressure-retaining part or may result from the original casting manufacturing process. Inservice thin areas may result from mechanical wear, erosioncorrosion caused by steam and condensate flow, corrosion, impact damage, or grinding for the removal of material flaws.
- b) Evaluation of thinning for repair shall consider the unique design and loading characteristics of the Yankee dryer. Local thin areas are often analyzed as specific cases by the finite element method.
 - 1) When a LTA is evaluated by finite element method, analysis should consider the location of the thin area and account for strength provided by the vessel center shaft and heads in addition to the strength provided by the shell alone. Such structural analysis should consider all relevant loads to ensure safe operation of the shell according pressure vessel to the De-rate Curve, or other pressure-retaining parts as indicated on the original Manufacturer's Data Report.
 - 2) Following evaluation and determination of maximum allowable operating parameters, an LTA can be coated or filled to prevent further wear or deterioration. Grooves and gouges should always be lightly ground to remove sharp notches and edges. Welding or brazing repairs are NOT permitted on cast-iron pressure-retaining components.
 - Where the LTA is of sufficient size to cause a reduction in maximum allowable operating parameters according to the De-rate Curve, an R-2 form shall be submitted.
 - Depending upon the cause of the LTA, further monitoring may be necessary to ensure deterioration has been arrested.
 - 5) Inspection data, including all thickness readings and corresponding locations used to determine the minimum and average thicknesses, and the accompanying stress analysis, should be included in the documentation and retained for the life of the vessel.

S5.6.2 TREATMENT ASSESSMENT OF CRACK-LIKE FLAWS

- a) Crack-like flaws are planar flaws that are predominantly characterized by a length and depth with a sharp root radius. They may either be embedded or surface breaking. In some cases it may be advisable to treat volumetric flaws, such as aligned porosity, inclusions, and laps, as planar flaws, particularly when such volumetric flaws may contain microcracks at the root.
 - 1) Knowledge of local stress level and classification, and of flaw origin, type, size, location, and angle relative to the principal stress direction is essential in making determinations regarding remediation. It is also important to know whether the crack is active. Acoustic Emissions testing can be used to determine if the crack is active. Various other methods of nondestructive examination should be employed to determine crack length and depth. Ultrasonics is the recommended sizing technique for depth and inclination of crack-like flaws. Magnetic particle, specifically the wet fluorescent technique, and liquid penetrant methods are applicable in determining the length of a surface flaw. Radiographic and metallographic methods may also be useful. Metallographic analysis is crucial in differentiating between original casting flaws and cracks.
 - Evaluation of crack-like flaws, that have been determined to be cracks is most often accomplished through removal via grinding or machining. Because cast iron is categorized as a

brittle material, this is the conservative approach regarding crack-like flaws. Welding or brazing repairs are not permitted for cast-iron parts. Crack like flaws are most often removed via grinding or machining. Weld repairs are permitted in steel, but not in cast iron. Metal-stitching is permitted as a repair. However this method of repair requires evaluation as to whether a reduction in allowable operating conditions is required. This evaluation shall be performed by the manufacturer or by another qualified source acceptable to the Inspector.

- Crack-like flaws that have been identified as cracks, but which developed from normal service
 exposure or excessive operating conditions, shall be remediated by appropriate means
 regardless of location.
- 4) Crack-like flaws that have been identified as cracks that developed through non-standard load events, such as by water hoses from operation or firefighting or mechanical damage, shall be evaluated and remediated as necessary. if in the shell. Cracks in other pressure-retaining parts shall be analyzed, documented, and monitored to ensure their presence will not be, or has not been, affected by current operating conditions.
- 5) Crack-like flaws that are not identified as cracks, but which existed in the original material, i.e., material flaws, shall be analyzed, documented, and monitored to ensure their presence will not be, or have not been, affected by current operating conditions.
- b) All documents pertaining to the crack-like flaw assessment shall be retained for the life of the vessel. Documentation should address the engineering principles employed, including stress analysis methods and flaw sizing, the source of all material data used, identification of any potential material property degradation mechanisms and the associated influence on the propagation of flaw, and the criteria applied to the assessment procedures.

S5.6.3 DRIVEN PLUG REPAIR

Shell Cast iron shell surface imperfections should may be repaired with smooth, driven plugs as described in ASME Section VIII, Div. 1, UCI-78, with the following additional requirements:

- a) Maximum plug length (depth) shall be limited to 20% of shell effective thickness, and plug diameter shall not exceed the plug length (depth);
- Total surface area of plugs shall not exceed 4 sq. in. in an 8 in. diameter circle (2580 sq. mm in a 200 mm diameter circle);
- c) Average number of shell plugs shall not exceed 1 plug per 1 sq. ft. (1 plug per 0.1 sq. m) of the surface:
- d) The land distance between edges of plugs shall be at least equal to the diameter of the larger plug;
- e) The plug material shall conform in all respects to the material specification of the base material;
- f) The installed plug shall have an interference fit. The average hole diameter is determined after the plug hole is drilled or reamed. The maximum plug diameter shall not exceed 1.012 times the average hole diameter. This provides an interference fit while minimizing the residual stresses;
- g) All plug repair work shall be documented in the form of a plug repair map or other suitable method of recording and retained in the dryer's permanent file.

S5.6.4 THREADED PLUG REPAIR

Casting defects, leaks and local thin areas should-may be repaired with threaded plugs as described in ASME Section VIII, Division 1, UCI-78 with the additional requirement that a threaded plug shall not be used in an area subject to dynamic high frequencythermal/mechanical fatigue stresses fatigue loading (e.g., Yankee dryer shell) as determined by the manufacturer or another qualified source acceptable to the Inspector.

\$5.7 ALTERATIONS TO YANKEE DRYERS

\$5.7.1 SCOPE

This supplement provides additional requirements for alterations to Yankee dryer pressure-retaining components and shall be used in conjunction with NBIC Part 3, Sections 2 through 5, as appropriate.

\$5.7.2 ALTERATION TYPES

- a) Any change in the Yankee dryer (shell, heads, center shaft, journals, manway covers, fasteners), as described on the original Manufacturer's Data Report, which affects the pressure-retaining capability, shall be considered an alteration. Examples of alterations are:
 - 1) Drilling/enlarging of bolt holes in castings for larger diameter bolts;
 - Replacement of structural bolts differing in size, material, or design, from those described on the Manufacturer's Data Report;
 - 3) Removal of shell overhung flange;
 - 4) Journal outside diameter reduction to install a sleeve machining;
 - 5) Head flange outside diameter reduction;
 - 6) Machining of head flange or shell flange surface mating surfaces to remove corrosion; and
 - 7) Changes to Operating above the nameplate temperature.
- b) Alteration <u>plans to yankee dryers</u> <u>procedures shall be written, reviewed, approved, and shall be accepted by the Inspector, and when required, by the Jurisdiction, prior to the start of work.</u>

Item 22-12: Lost or Destroyed UDS (Part 3, 3.3.5.2 & 3.4.5.1)

Explanation of Need: To provide the ability to repair/alter these vessels with a reconstructed UDS.

Background Information: This addition is based on the comments received at the task group level for Interpretation 21-60.

Proposed Changes:

3.3.5.2 REPAIR PLAN

The user shall prepare, or cause to have prepared, a detailed plan covering the scope of the repair.

a) Engineer Review and Certification

The repair plan shall be reviewed and certified by an engineer meeting the criteria of ASME Section VIII, Division 2 or 3, as applicable, for an engineer signing and certifying a Manufacturer's Design Report. The review and certification shall be such as to ensure the work involved in the repair is compatible with the User's Design Specification and the Manufacturer's Design Report. The certifying requirement may be waived for ASME Section VIII, Division 2, Class 1 vessels that did not require the Manufacturer's Design Report to be certified during initial construction.

If the User's Design Specification (UDS) is lost or destroyed, the ASME nameplate, and the applicable ASME Section VIII, Division 2 and 3 formsManufacturer's Data and Partial Data Reports shall be used to reconstruct the User's Design Specification-such as Form A-1 Manufacturer's Data Report, Form A-2 Manufacturer's Partial Data Report for Section VIII, Division 2 vessels or Manufacturer's Data Reports for Section VIII, Division 3. The reconstructed UDS shall meet the requirements of ASME Section VIII, Division 2 or Division 3.

Note: The engineer qualification criteria of the Jurisdiction where the pressure vessel is installed should be verified before selecting the certifying engineer.

b) Authorized Inspection Agency Acceptance

Following review and certification, the repair plan shall be submitted for acceptance to the Authorized Inspection Agency/Owner-User Inspection Organization whose Inspector will make the acceptance inspection and sign the Form R-1.

3.4.5.1 ALTERATION PLAN

a) Engineer Review and Certification

The alteration plan shall be reviewed and certified by an engineer meeting the criteria of ASME Section VIII, Division 2 or 3, as applicable, for an engineer signing and certifying a Manufacturer's Design Report. The review and certification shall be such as to ensure the work involved in the alteration is compatible with the User's Design Specification and the Manufacturer's Design Report.

Provided that the alteration does not introduce a condition that would require an engineer to sign the Manufacturer's Design Report for ASME Section VIII, Division 2, Class 1 vessels, the certifying requirement may be waived for vessels that did not require the Manufacturer's Design Report to be certified during initial construction.

Formatted: Indent: Left: 0.25'

Formatted: Indent: Left: 0.25"

Formatted: Indent: Left: 0.25"

If the User's Design Specification (UDS) is lost or destroyed, the ASME nameplate, and the applicable ASME Section VIII, Division 2 and 3 formsManufacturer's Data and Partial Data Reports shall be used to reconstruct the User's Design Specification-such as Form A-1 Manufacturer's Data Report, Form A-2 Manufacturer's Partial Data Report for Section VIII, Division 2 vessels or Manufacturer's Data Reports for Section VIII, Division 3. The reconstructed UDS shall meet the requirements of ASME Section VIII, Division 2 or Division 3.

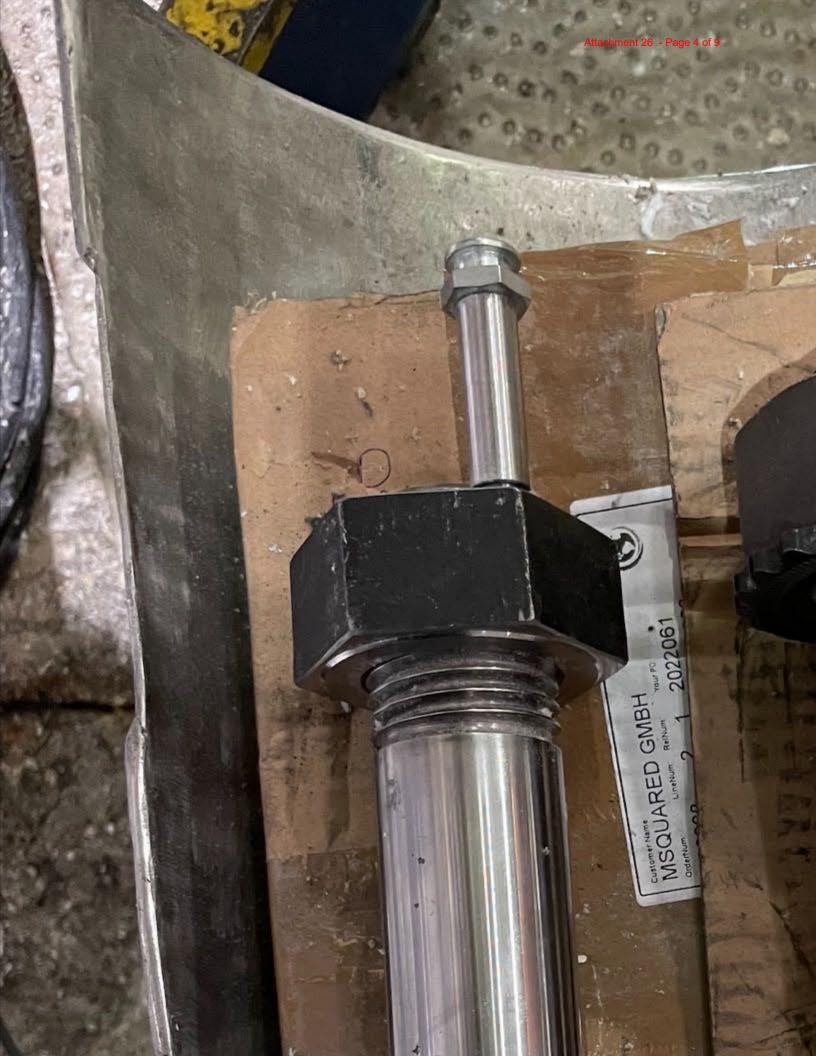
Note: The engineer qualification criteria of the jurisdiction where the pressure vessel is installed should be verified before selecting the certifying engineer.



Item No. A22-17
Subject/Title
NBIC Part 3, S5.7.2, a), 1) and the examination methods of Part 3, 4.4.2, c)
Project Manager and Task Group Tim McBee-PM
Source (Name/Email)
Steve Ayotte steve.ayotte@tuvsud.com
Statement of Need
An additional examination option is needed for alterations performed to NBIC S5.7.2 a) 1).
Background Information When fasteners on dryers are no longer suitable for the intended service, an alteration may be performed by enlarging bolt holes to accept larger diameter bolts. This may be accomplished as a field alteration with the heads in place. Prior to performing the alteration, a finite element analysis (FEA) is performed to evaluate and approve stress levels and to ensure sufficient clamping to retain pressure. A thorough cleaning and visual inspection of enlarged holes and fastener seating surfaces are performed to verify no cracks or other indications. As there is only the removal of existing material by drilling and the original Code of Construction does not require NDE for the drilled holes, a visual inspection should be an acceptable examination. A liquid pressure test is generally not practicable. Existing Text
None
Proposed Text
S5.7.3 Pressure testing of alterations shall be performed in accordance with NBIC Part 3, 4.4.2, and Part 2, S5.6. When enlarging bolt holes referenced in Part 3, S.5.7.2 a) 1), the item shall be visually examined and tested in accordance with the rules for repairs (see NBIC Part 3, 4.4.1).

















Item No.	
A 22-18	
Subject/Title	
Definition of blowdown and blowoff	
NBIC Location	
Part: Installation & Pressure Relief Devices; Section: Section 9 & 9; Pa	ragraph: 1 & 1
Project Manager and Task Group	
Kathy Moore, Subcommittee Repairs/Alterations	
Source (Name/Email)	
Kathy Moore / kathymoore@joemoorecompany.com	
Statement of Need	
These terms are not consistently used throughout the industry. This is equipment or the action.	to provide guidance to use the correct term when addressing the
Background Information	
Gary Scribner is updating NB-27 which addresses this action and equip documents. I will be glad to be the PM and present it to each group.	oment. We want to have consistent terminology used for all NB
Existing Text	Proposed Text
	Blowoff - the equipment and piping used when blowing down equipment such as boiler
	Blowdown - The act of releasing liquid, steam, or air with the purpose of removing solids or impurities from equipment

	VOTE:						
COMMITTEE	Approved	Disapproved	Abstained	Not Voting	Passed	Failed	Date

Item 22-23

Subject: Removing Section 8 from all 4 Parts of the NBIC

Explanation of Need: The current wording in Section 8 is obsolete and the actual process for submitting Interpretations, Code Revisions, and Code Additions is now located in the Introduction of the NBIC.

Project Manager: Gary Scribner

Proposed Change:

All text in Section 8 will be deleted and replaced with the following:

The process for submitting Interpretations, Code Revisions, and Code Additions hashave been moved to the Introduction of this book.