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*THE NATIONAL BOARD  
OF BOILER AND PRESSURE VESSEL INSPECTORS*

# **NATIONAL BOARD INSPECTION CODE SUBCOMMITTEE PRESSURE RELIEF DEVICES**

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## **MINUTES**

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Meeting of July 9, 2025  
Cincinnati, OH

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 Adam Renaldo called the meeting to order at 8:07 AM EDT on Wednesday, July 9<sup>th</sup>, 2025. Members and guests in attendance can be found on the Attendance Sheet (Attachments pg 1)

## 2. Introduction of Members and Visitors

## 3. Check for Quorum

## 4. Announcements

- This meeting marks the end of Cycle B for the 2027 NBIC edition.
- The National Board will be hosting a reception on Wednesday evening from 5:30 p.m. to 7:30 p.m. at Ault Park, on the 4<sup>th</sup> floor of the hotel.
- The National Board will be hosting breakfast and lunch on Thursday for those attending the Main Committee meeting. Breakfast will be served from 7:00 a.m. to 8:00 a.m. in Madisonville A/B, and lunch will be served from 11:30 a.m. to 12:30 p.m. in Madisonville A/B.
- Meeting schedules, meeting room layouts, and other helpful information can be found on the National Board website under the **NBIC** tab → NBIC Meeting Information.
- The NBIC Committee has transitioned from NB File Share to SharePoint. Remember to add any attachments that you'd like to show during the meeting (proposals, reference documents, powerpoints, etc.) to the NBIC SharePoint site ([nationalboard.sharepoint.com/sites/NBIC](http://nationalboard.sharepoint.com/sites/NBIC)) **prior to the meeting**.
  - Note that access to the NBIC SharePoint site is limited to committee members only.
  - ALL powerpoint attachments/presentations must be sent to the NBIC Secretary for approval prior to the meeting.
  - Contact Jonathan Ellis ([nbicsecretary@nbbi.org](mailto:nbicsecretary@nbbi.org)) for any questions regarding NBIC SharePoint access.
- When possible, please submit proposals in Word format showing “strike through/underline.” Project Managers: please ensure any proposals containing text from previous NBIC editions are updated with text from the most current edition.
- If you'd like to request a new Interpretation or Action item, do so on the National Board Business Center.
  - Anyone, member or not, can request a new item.
- As a reminder, anyone who would like to become a member of a group or committee:
  - Should attend at least two meetings prior to being put on the agenda for membership consideration. The nominee will be on the agenda for voting during their third meeting.
  - The nominee must submit the formal request along with their resume to the NBIC Secretary **PRIOR TO** the meeting. [nbicsecretary@nbbi.org](mailto:nbicsecretary@nbbi.org)
  - If needed, we can also create a ballot for voting on a new member between meetings.
- With the release of the new 2025 Edition of the NBIC the National Board has a gift for all NBIC Committee Members to show our appreciation for all your hard work. Please see Jonathan or Luis in the NB office (Mt. Washington Room), located here on the 4th Floor to receive yours.
- Thank you to everyone who registered online for this meeting. The online registration is very helpful for planning our reception, meals, room setup, etc. It is also a good way to make sure we have the most up-to-date contact information. Please continue to use the online registration for each meeting.

## 5. Adoption of the Agenda

A motion was made to adopt the agenda. The motion was seconded and approved unanimously.

**6. Approval of Minutes of the January 2025 Meeting**

A motion was made to adopt the minutes from the January 2025 meeting. The motion was seconded and approved unanimously.

**7. Awards/Special Recognition**

**8. Review of the Roster**

**a. Nominations**

**b. Reappointments**

- i. The following **Subgroup PRD** memberships are up for reappointment: Mr. Eben Creaser, Mr. Prakash Dhobi, Mr. Alfred Donaldson, Mr. David Sullivan, and Mr. Tom Tarbay.
  - i. Mr. Eben Creaser indicated that he did not wish to continue serving on Subgroup PRD
  - ii. Mr. Dhobi, Mr. Donaldson, Mr. Sullivan, and Mr. Tarbay all indicated that they intend to continue serving on Subgroup PRD
    - A motion was made to approve reappointment for the listed individuals. The motion was seconded and approved unanimously.
- ii. The following **Subcommittee PRD** memberships are up for reappointment: Mr. Eben Creaser.
  - i. Mr. Creaser indicated that he intends to continue serving on Subcommittee PRD.

**c. Resignations**

**d. Officer Selections**

**9. Interpretation Requests**

<b>Item Number: 24-38</b>	<b>NBIC Location: Part 4, 2.5.4.2 &amp; Part 1, 3.9.1.6 c)</b>	<b>No Attachment</b>
<b>General Description:</b> T&P relief device installation on modular HWH supply header		
<b>Task Group:</b> None assigned.		
<b>Explanation of Need:</b> The NBIC does not address the installation or location of a common T&P valve for modular HWH's. Clarification is needed on whether the common supply header can be considered part of the HWH, and whether T&P valves can be installed in the horizontal position with the outlet pointed down, if installed directly to the header with no more than 4 in. maximum interconnecting piping.		
<b>July 2025 Meeting Action:</b> This represents an intent interpretation. The associated action item must be approved before the interpretation can move forward.		

<b>Item Number: 24-46</b>	<b>NBIC Location: Part 4, 4.3.1 a)</b>	<b>No Attachment</b>
<b>General Description:</b> Replacement of Bodies and Transfer of Nameplates During Repair		
<b>Task Group:</b> None assigned.		
<b>Explanation of Need:</b> Clarity on what defines "the valve". Is "the valve" the nameplate solely or the nameplate and serialized base; and subsequent ability to divorce the nameplate and base during repair when the base requires replacement.		
<b>July 2025 Meeting Action:</b> This represents an intent interpretation. The associated action item must be approved before the interpretation can move forward.		

<b>Item Number: 24-87</b>	<b>NBIC Location: Part 4, 4.7.3 a) and b)</b>	<b>Attachment Page 4</b>
<b>General Description:</b> Changes to the original pressure relief device nameplate.		
<b>Task Group:</b> None assigned.		
<b>Explanation of Need:</b> Clarification is needed on the correct way to communicate changes to a relief device through nameplate stamping.		
<b>July 2025 Meeting Action:</b> A proposed question and reply was presented. A motion was made to approve the question and reply following revision. The motion was seconded and approved unanimously.		

**New Interpretation Requests:**

<b>Item Number: 25-10</b>	<b>NBIC Location: Part 4, 2.6</b>	<b>Attachment Page 5</b>
<b>General Description:</b> Is a Pressure Relief Device the only Relief Method for Pressure Vessels?		
<b>Task Group:</b> None assigned.		
<b>Explanation of Need:</b> The jurisdiction is claiming the NBIC implies that a pressure relief device is the only acceptable relief method for a pressure vessel since Part 4 Section 2.6 only addresses pressure relief devices.		
<b>July 2025 Meeting Action:</b> A proposed question and reply was presented. A motion was made to accept the proposed question and reply. The motion was seconded and approved unanimously.		

**10. Action Items**

**a. Items From other Committees**

**i. Item 24-18 – Definition of Controlled Fill (P. Gilston as PM)**

Note: The Subcommittee was informed that the PM withdrew the proposal. No action at this time.

<b>Item Number: NB15-0305</b>	<b>NBIC Location: Part 4</b>	<b>No Attachment</b>
<b>General Description:</b> Create Guidelines for Installation of Overpressure Protection by System Design.		
<b>Task Group:</b> B. Nutter, A. Renaldo, D. Marek (PM), D. DeMichael, J. Wolf, D. Schirmer, J. Grace, D. Sullivan		
<b>July 2025 Meeting Action:</b> This item will transition to NBIC Part 2 to give guidance for inspection. A motion was made to close this item with no action. The motion was seconded and approved with one abstention (D. DeMichael), and one Negative vote (B. Nutter). A new item will be opened to address inspection of overpressure protection by system design in Part 2. A list of parties that would like to be involved in the task group for a new item will be sent to Part 2. Reasons for the negative vote and abstention can be found in the attachments.		

<b>Item Number: NB15-0315</b>	<b>NBIC Location: Part 4, 2.5.6 and 2.6.6 and Part 1, 4.5.6 and 5.3.6</b>	<b>No Attachment</b>
<b>General Description:</b> Review isolation Valve Requirements, and reword to allow installation of pressure relief devices in upstream piping.		
<b>Task Group:</b> D. DeMichael, B. Nutter (PM), A. Renaldo, D. Marek, K. Beise		
<b>July 2025 Meeting Action:</b> Progress report. Work continues on this item.		

<b>Item Number: 19-83</b>	<b>NBIC Location: Part 4, Part 1</b>	<b>No Attachment</b>
<b>General Description:</b> Address alternate pressure relief valve mounting permitted by ASME CC2887-1.		
<b>Task Group:</b> D. Marek (PM), T. Patel, J. Ball, R. Ceccarelli		
<b>July 2025 Meeting Action:</b> Progress report. Work continues on this item.		

<b>Item Number: 21-08</b>	<b>NBIC Location: Part 4, S4.4</b>	<b>No attachment</b>
<b>General Description:</b> Additional guidance for tank vent repairs		
<b>Subgroup:</b> PRD		
<b>Task Group:</b> D. DeMichael, H. Cornett, B. Nutter (PM), K. Beise, J. Grace		
<b>Explanation of Need:</b> The recently approved S4.4, "Weight Loaded Vents," (NB12-0901) provided new guidance for tank vent repairs. Several additional topics need to be addressed to enhance the guidance. These topics include: 1) Suggested test equipment and configuration for the prescribed tank vent testing. 2) Minimum requirements for replacement parts, 3) Guidance for painting tank vent components.		
<b>July 2025 Meeting Action:</b> Progress report. Work continues on this item.		

<b>Item Number: 22-09</b>	<b>NBIC Location: Part 4, 4.6.1</b>	<b>No Attachment</b>
<b>General Description:</b> Add language to NBIC Part 4 for valves manufactured to Code Case 2787		
<b>Subgroup:</b> PRD		
<b>Task Group:</b> A. Donaldson (PM), H. Cornett, B. Nutter, T. Tarbay, J. Simms, T. Patel		
<b>Explanation of Need:</b> There are no requirements to address valve repairs that were manufactured or assembled to Code Case 2787 (use of more than one certified capacity on the pressure relief valve or the nameplate).		
<b>July 2025 Meeting Action:</b> Progress report. PM indicated that this item is waiting on final wording in ASME action item.		

<b>Item Number: 22-20</b>	<b>NBIC Location: Part 4, 4.7.4</b>	<b>No Attachment</b>
<b>General Description:</b> Inspection and testing of PRV's located above isolation valves.		
<b>Subgroup:</b> PRD		
<b>Task Group:</b> D. Marek (PM), K. Beise, J. Ball, E. Creaser, H. Cornett, A. Renaldo		
<b>Explanation of Need:</b> Add requirement to make sure the internals of a PRV inlet and outlet are inspected when it is tested, and require tests to be done with a pressure vessel with volume.		
<b>July 2025 Meeting Action:</b> Progress report. Work continues on this item.		

<b>Item Number: 23-32</b>	<b>NBIC Location: Part 4, 3.3 and Supp. 6</b>	<b>No Attachment</b>
<p><b>General Description:</b> Rules for T/O activities related to Nuclear Class Valves</p> <p><b>Subgroup:</b> PRD</p> <p><b>Task Group:</b> E. Creaser (PM), P. Dhobi, D. McHugh, J. Simms</p> <p><b>Explanation of Need:</b> Nuclear facilities that perform repair and T/O activities would by allowing them to use T/O for nuclear class valves that were serviced but not in need of repair but need to be set and sealed again.</p> <p><b>July 2025 Meeting Action:</b> Progress report. Work continues on this item.</p>		

<b>Item Number: 24-35</b>	<b>NBIC Location: Part 4, 4.6.2</b>	<b>No Attachment</b>
<p><b>General Description:</b> Update Testing of UV-Designated Steam valves on Air to match ASME XIII</p> <p><b>Subgroup:</b> PRD</p> <p><b>Task Group:</b> T. Beirne, B. Nutter, N. Bailey, B. DeKeyzer, D. Marek, A. Donaldson, C. Turner, H. Cornett (PM), T. Patel, I. Flynn</p> <p><b>Explanation of Need:</b> ASME Section XIII Table 3.6.3.1-1 Note 3 permits UV-designated steam valves to be tested using air when the valve is beyond the testing capabilities due to set pressure or capacity. The NBIC only permits steam valves to be tested on air by the owner/user. This should be permitted by any VR shop that has steam test equipment since it is permitted under the rules for new construction.</p> <p><b>July 2025 Meeting Action:</b> Progress report. Work continues on this item. B. Nutter, N. Bailey, B. DeKeyzer, D. Marek, A. Donaldson, C. Turner, H. Cornett, T. Patel, and I. Flynn were added to the task group to further develop the proposal. H. Cornett was reassigned as PM.</p>		

<b>Item Number: 24-72</b>	<b>NBIC Location: Part 4, 4.3.1</b>	<b>No Attachment</b>
<p><b>General Description:</b> Add Language to Address Replacement of Valve Bodies and Bases</p> <p><b>Subgroup:</b> PRD</p> <p><b>Task Group:</b> A. Donaldson (PM), G. Salwan, E. Creaser, H. Cornett, B. Nutter, P. Dhobi, T. Tarbay, T. Patel</p> <p><b>Explanation of Need:</b> Under the current text of 4.3.1 there are no guidelines for the replacement of valve components to which the original nameplate is attached.</p> <p><b>July 2025 Meeting Action:</b> Progress report. Work continues on this item.</p>		

<b>Item Number: 24-91</b>	<b>NBIC Location: Part 4, 3.2.3, Part 1 S3.6 d)</b>	<b>No Attachment</b>
<p><b>General Description:</b> Require means to prevent safety valve discharge piping blockage for LCDSV (Part 4)</p> <p><b>Subgroup:</b> PRD</p> <p><b>Task Group:</b> A. Renaldo (PM), J. Simms, D. Schirmer, D. Sullivan, R. Ceccarelli</p> <p><b>Explanation of Need:</b> Adding verbiage to the NBIC Part 1, Part 2 and Part 4 to require a means to prevent foreign material introduction to the safety valve discharge pipe.</p> <p><b>July 2025 Meeting Action:</b> Progress report. Work continues on this item.</p>		

<b>Item Number: 24-101</b>	<b>NBIC Location: Part 4, Sections 3 and 4</b>	<b>No Attachment</b>
<p><b>General Description:</b> Revise NBIC to expand VR and T/O programs beyond ASME Certified Valves</p> <p><b>Subgroup:</b> PRD</p> <p><b>Task Group:</b> E. Creaser (PM), D. Marek, T. Beirne, H. Cornett, K. Beise, R. Viers, N. Bailey, A. Donaldson,</p> <p><b>Explanation of Need:</b> The National Board upper management and Board of Trustees have decided to expand the VR and T/O programs to valves that are constructed to standards other than ASME. The proposal file contains changes that would accomplish this goal. Changes to NB-514 and NB-528 will follow.</p> <p><b>July 2025 Meeting Action:</b> Progress report. Work continues on this item.</p>		

<b>Item Number: 25-01</b>	<b>NBIC Location: Part 4, 4.7.3</b>	<b>Attachment Page 6</b>
<p><b>General Description:</b> Review and Clarify Guidelines for Nameplate Stamping Following Conversion</p> <p><b>Subgroup:</b> PRD</p> <p><b>Task Group:</b> J. Simms (PM), E. Heck, C. Turner, N. Bailey, P. Dhobi, D. Mosley, B. Nutter, D. Schirmer</p> <p><b>Explanation of Need:</b> The current NBIC language lacks sufficient detail and instruction for modification of original nameplate information following conversion.</p> <p><b>Background Information:</b> This stems from I24-87, requesting guidance on how much information should be marked out from original model number/type.</p> <p><b>July 2025 Meeting Action:</b> A proposal was presented. A motion was made to accept the proposal. The motion was seconded and approved unanimously.</p>		

**11. New Business**

<b>Item Number: 25-08</b>	<b>NBIC Location: Part 4, 4.6.1</b>	<b>No Attachment</b>
<p><b>General Description:</b> Add Requirements for Qualification of Mobile Test Equipment</p> <p><b>Subgroup:</b> PRD</p> <p><b>Task Group:</b> None assigned.</p> <p><b>Explanation of Need:</b> The current working in 4.6.1 only addresses performance test equipment. We do not address mobile test equipment. I believe we need to add a new paragraph 4.6.1 c) that addresses test equipment other than just the performance test equipment.</p> <p><b>Background Information:</b> Per T. Tarbay: The reason I think we need to address test equipment is I am finding shops that are using low volume tests stands for field testing (i.e. nitrogen bottle with an air hose). As you know, using these low volume stands, you cannot "pop" a valve.</p> <p><b>July 2025 Meeting Action:</b> A proposal was presented. A motion was made to close this item with no action, as the subcommittee felt this was already addressed with existing language. The motion was seconded and approved unanimously.</p>		

<b>Item Number: 25-19</b>	<b>NBIC Location: Part 4, Supplement 4</b>	<b>No Attachment</b>
<p><b>General Description:</b> Spring slackness with time in the HP steam for more than 5 years</p> <p><b>Subgroup:</b> PRD</p> <p><b>Task Group:</b> None assigned.</p> <p><b>Explanation of Need:</b> The current NBIC guidelines do not explicitly address the time-dependent degradation of safety valve springs in high-temperature steam services. We have observed premature opening of safety valves in our HP steam headers, which has been attributed to spring relaxation over time. Without specific guidance on inspection frequency and replacement intervals, there is a risk of undetected spring degradation leading to operational disruptions, potential overpressure events, and increased maintenance costs. This amendment will provide clear and practical recommendations to mitigate these risks.</p> <p><b>Background Information:</b> To ensure the continued reliability and integrity of high-pressure steam safety valves, it is proposed that the NBIC guidelines be amended to include:</p> <ol style="list-style-type: none"> <li>1- Mandatory spring inspection during each scheduled safety valve inspection. This inspection should include, but not be limited to, assessing spring relaxation, free height, and visual inspection for signs of fatigue or damage.</li> <li>2- A recommended spring replacement interval of five years for safety valves operating in high-temperature steam services. This interval is based on observed spring relaxation and the potential for thermal/mechanical fatigue over time.</li> </ol> <p>This amendment aims to proactively address the issue of premature safety valve operation and potential spring failures, enhancing safety and operational reliability.</p> <p><b>July 2025 Meeting Action:</b> Inspection frequency is addressed in Part 4 Table 3.2.6. A motion was made to close this item with no action. A letter from the Chair of SG PRD will be sent to the inquirer. The motion was seconded and approved unanimously.</p>		

<b>Item Number: 25-30</b>	<b>NBIC Location: Part 4, 4.7.2 b) 3)</b>	<b>No Attachment</b>
<p><b>General Description:</b> Association of Repair for Pilots and Main Valves</p> <p><b>Subgroup:</b> PRD</p> <p><b>Task Group:</b> N. Bailey, J. Simms, D. Marek, D. Mosley, P. Dhobi, C. Turner, K. Beise, I. Flynn, B. Nutter, B. DeKeyzer, H. Cornett, A. Renaldo (PM)</p> <p><b>Explanation of Need:</b> There is currently not language tying the pilot and main valve of a pilot-operated pressure relief valve to one another following repair.</p> <p><b>Background Information:</b> ASME Section XIII 3.9 (f) (1) mandates that the pilot and main valve of a pilot-operated pressure relief valve each be marked with the same unique identifier to establish association of both components. This would create a similar requirement in NBIC to establish association of the pilot and main valve of pilot-operated pressure relief valves as being part of a single VR repair.</p> <p><b>July 2025 Meeting Action:</b> A proposal was presented. A task group was assigned to further develop the proposal.</p>		

<b>Item Number: 25-38</b> <b>NBIC Location: Part 4, 3.2.5.1 and 4.6.1</b> <b>No Attachment</b>
<b>General Description:</b> Address Testing of Pilot Valves as Complete Assembly
<b>Subgroup:</b> PRD
<b>Task Group:</b> N. Bailey, J. Simms, D. Marek, D. Mosley, P. Dhobi, C. Turner, K. Beise, I. Flynn, B. Nutter, T. Patel, H. Cornett, B. DeKeyzer, A. Renaldo (PM)
<b>Explanation of Need:</b> ASME CC 3057 requires that pilot operated valves be tested at least once as a complete assembly to verify all components are properly connected, leak tight, and that the pilot actuates the main valve. This also verifies freedom of operation of the main valve.
<b>Background Information:</b> Pilot operated valves in service have been field tested by checking pilot set point without verification that the main valve will open.
<b>July 2025 Meeting Action:</b> A proposal was presented. A task group was assigned to further develop the proposal.

**12. Future Meetings**

- January 12-15, 2026 – New Orleans, LA

**13. Adjournment**

A motion was made to adjourn the meeting. The motion was seconded and approved unanimously. The meeting adjourned at 9:40 AM EDT.

Respectfully Submitted,



Robert Viers  
Secretary, Subcommittee Pressure Relief Devices



**From:** [Nutter, Brandon K](#)  
**To:** [Bob Viers](#); [Marek, Daniel T. \(GRC-FDS0\)\[MAINTHIA TECHNOLOGIES\]](#)  
**Subject:** Reason for Negative on today"s voice vote for closure of NB15-0305  
**Date:** Tuesday, July 8, 2025 3:32:53 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)

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Bob and Dan,

I voted negative on the action to close NB15-0305 with no action premised on the notion that Part 2 will act on this issue based on reported discussions by the Board of Trustees. As is evident from the recent interpretation request, the need for the NBIC to finally address overpressure protection methods other than pressure relief devices is important to the industry and the current NBIC requirements are causing confusion. I do not support closing this action item until there is positive verification that Part 2 is indeed going to act on this critical issue. I will not be opposed to closing this action after work has begun on the Part 2 item.

I also believe the Board of Trustees erred greatly by choosing to limit the scope of Part 4 to only pressure relief devices. As is evident in many other SDO's (i.e., ASME Section XIII, API SC-PRS, EN 764-7, etc.), pressure relief device SMEs are often also the overpressure protection by system design SMEs. If using ASME Section XIII as a basis, the largest group of overpressure protection by system design SMEs lies within NBIC SG/SC PRD (Part 4) where 6 members of SC/SG PRD are also members of ASME Section XIII or XIII SG- General Requirements, which are responsible for OPPBSD in ASME BPVC. The Part 2 Installation subcommittee and subgroup have ZERO members involved with ASME BPV XIII or XIII SG-GR. It would make the most logical sense (and follow the rest of the global SDOs) to expand the scope and redesignate Part 4 as "Overpressure Protection" and make Part 4 responsible for all of the overpressure protection requirements across the various NBIC Parts. Just like with the existing pressure relief device requirements, the requirements from Part 4 would be copied into Part 2 for use by inspectors.


Sincerely,

**Brandon K. Nutter**  
 Corporate Competency Leader – Overpressure Protection  
 DuPont Engineering Technology Center



Office Number: +1-804-915-6994  
 Cell Phone Number: +1-804-920-9217  
 CRP 730 | 974 Centre Road | Wilmington, DE 19805  
[www.dupont.com](http://www.dupont.com)

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**From:** [Denis DeMichael](#)  
**To:** [Bob Viers](#)  
**Subject:** Re: Reason for Abstention on vote for NB15-0305  
**Date:** Thursday, August 7, 2025 10:22:52 AM  
**Attachments:** [image001.png](#)

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The reason for my vote is I believe SC Pressure Relief Devices have the most qualified SMEs on Overpressure Protection by System Design of all the SC's. Membership includes several members of ASME Section XIII where the requirements reside in the code. Current membership even includes the individual who was part of the task group that developed the initial code case and then its original incorporation into Section VIII.

Bob, if it's not too late you can change my vote to negative.

Regards,  
Denis

On Wed, Aug 6, 2025 at 3:09 PM Bob Viers <[rviers@nationalboard.org](mailto:rviers@nationalboard.org)> wrote:

Hey Denis,

Just following up. Per NB-240 7.1.3, I need a written explanation for your abstention vote on closing item NB15-0305 (OP Protection by System Design). I would like to get my minutes turned in as soon as possible, and I need this for the attachments.

Sincerely,

**Robert Viers**

*Senior Staff Engineer*

*Technical Department, Pressure Relief Laboratory*



The National Board of Boiler and Pressure Vessel Inspectors

Testing Laboratory

Item I24-87



**THE NATIONAL BOARD  
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<b>Subject:</b>	Changes to the original pressure relief device nameplate.
<b>NBIC Location:</b>	2023 NBIC Part 4, 4.7.3 a) and b)
<b>Statement of Need:</b>	Clarification is needed on the correct way to communicate changes to a relief device through nameplate stamping.
<b>Background Information:</b>	A VR certificate holder has been audited and has received corrective actions for only stamping out the items of a relief device's part number that have been changed. The shop was given guidance to update their quality control manual to stamp out the entire part number even when not all components have been changed.
<b>Proposed Question:</b>	Part 4, paragraph 4.7.3 (a) second sentence states "For these repairs, the invalidated information on the original nameplate or stamping shall be marked out but left legible." Is the invalidated information considered the to be the entire field (for example entire model number or only a portion of model number)?
<b>Proposed Reply:</b>	No. Only the portion that is invalidated shall be marked out but left legible. However, the entire new model number shall be marked on the VR nameplate.
<b>Committee's Question:</b>	Part 4, paragraph 4.7.3 (a) second sentence states "For these repairs, the invalidated information on the original nameplate or stamping shall be marked out but left legible." Is the invalidated information considered to be the entire field?
<b>Committee's Reply:</b>	Yes
<b>Rationale:</b>	The intention is to mark out the entire field, however, the invalidated/incorrect information shall remain legible.

Item I25-10



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<b>Subject:</b>	Is a Pressure Relief Device the only Relief Method for Pressure Vessels?
<b>NBIC Location:</b>	2023 NBIC, Part 4, 2.6
<b>Statement of Need:</b>	The jurisdiction is claiming the NBIC implies that a pressure relief device is the only acceptable relief method for a pressure vessel since Part 4 Section 2.6 only addresses pressure relief devices.
<b>Background Information:</b>	NBIC Part 4 Section 2.6 only provides requirements for the pressure relief devices that protect pressure vessels. This does not mean that a pressure relief device is the only relief method for pressure vessels. ASME Section VIII Div 1 permits the use of open flow paths and overpressure protection by system design which do not have pressure relief devices.
<b>Proposed Question:</b>	NBIC Part 4 Section 2.6 only provides requirements for the pressure relief devices that protect pressure vessels. Is NBIC Part 4 Section 2.6 declaring that a pressure relief device is the only relief method for pressure vessels?
<b>Proposed Reply:</b>	No.
<b>Committee's Question:</b>	NBIC Part 4 Section 2.6 provides requirements for pressure relief devices that protect pressure vessels. Is NBIC Part 4 Section 2.6 declaring that a pressure relief device is the only overpressure protection method for pressure vessels?
<b>Committee's Reply:</b>	No.
<b>Rationale:</b>	NBIC Part 4, 2.6 addresses the requirements for Pressure Relief Devices when used as the method of overpressure protection for pressure vessels.

## **Part 4 2023 Edition (with proposed changes)**

### **4.7.3 CHANGES TO ORIGINAL PRESSURE RELIEF VALVE NAMEPLATE INFORMATION**

a) Information on the original nameplate or stamping, such as but not limited to set pressure, capacity, blowdown, or type/model number may no longer be valid following certain repair activities. For these repairs, the ~~entire field containing the~~ invalidated information on the original nameplate or stamping shall be marked out, but ~~historical data must be~~ left legible. Any changes to capacity shall be based on that for which the valve was originally certified, or if a conversion has been made, as described in 4.2, on the capacity certification for the valve as converted.

b) Repair organizations shall verify the Type/Model number, inlet size, set pressure, and capacity on the original nameplate or stamping that is not marked out. ~~The entire field containing~~ incorrect information on the original manufacturer's nameplate or stamping shall be marked out, ~~in its entirety,~~ but left legible. Corrected information shall be indicated on the repair nameplate and noted on the document as required by the quality system.

### **4.7.4 ILLEGIBLE OR MISSING NAMEPLATES**

The VR Certificate Holder shall not perform repairs under the VR Program on any pressure relief valve (PRV) that cannot be positively identified by the manufacturer or through in-house sources. Such identification shall include the verification of the original ASME Stamping. Pressure relief valves that have missing or illegible nameplates and can be positively identified shall be equipped with a nameplate marked "DUPLICATE", which contains all original nameplate data. The duplicate nameplate shall not bear the "NB" Mark or the ASME Certification Mark. To indicate the original designator or code stamping, the duplicate nameplate shall be stamped with a "V", "HV", or "UV" as applicable. Illegible nameplates, if applicable, shall not be removed.