Date Distributed:

THE NATIONAL BOARD
OF BOILER AND PRESSURE VESSEL INSPECTORS

NATIONAL BOARD INSPECTION CODE
SUBCOMMITTEE PRESSURE RELIEF DEVICES

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MINUTES

Meeting of January 14, 2026
New Orleans, LA

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 8:00 AM CST on Wednesday, January 14, 2026. Members and guests in attendance can be found on the attached attendance sheet. See attachments page 1.

2. Introduction of Members and Visitors

3. Check for Quorum

4. Announcements

- This meeting marks the end of Cycle C 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 The Hard Rock Café on Bourbon Street.
- 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 the Atrium on the 2nd floor of the hotel, and lunch will be served at the same location from 11:30 a.m. to 12:30 p.m.
- 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) **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*) 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*
    - If needed, we can also create a ballot for voting on a new member between meetings.
- 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.

The NBIC meeting Code of Conduct was reviewed, followed by a brief discussion. The Chair clarified that it is permissible for a code of conduct to also include disciplinary measures for violations thereof.

5. Adoption of the Agenda

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

6. **Approval of Minutes of the July 2025 Meeting**
   A motion was made to approve the minutes from the July 2025 meeting. The motion was seconded and approved unanimously.

7. **Awards/Special Recognition**

   Chair Adam Renaldo presented Mr. Dan Marek with a pin recognizing his 10 years of service on Subcommittee PRD

8. **Review of the Roster**
   a. **Nominations**

   b. **Reappointments**

   The following **Subgroup** memberships are up for reappointment: Mr. Denis DeMichael, Mr. Brandon Nutter, Mr. Adam Renaldo, Mr. Del Schirmer, and Mr. Jon Wolf.

   Mr. Brandon Nutter, Mr. Adam Renaldo, Mr. Del Schirmer, and Mr. Jon Wolf were recommended for reappointment by SG PRD. A motion was made to affirm the reappointments. The motion was seconded and approved unanimously. Mr. Denis DeMichael indicated that he did not wish to continue serving on SG PRD.

   The following **Subcommittee** memberships are up for reappointment: Mr. Adam Renaldo, Mr. Jay Simms, Mr. Kim Beise, Mr. Alfred Donaldson, Mr. Del Schirmer, and Mr. Jon Wolf.

   All members indicated that they intend to continue serving. A motion was made to recommend reappointment. The motion was seconded and approved unanimously.

   c. **Resignations**
      i. Mr. Denis DeMichael has announced his resignation from Subgroup and Subcommittee PRD.

   d. **Officer Selections**
   Mr. Adam Renaldo's and Mr. Jay Simms' terms as Chair and Vice Chair are set to end on January 31, 2026. Both are eligible for reappointment to these positions.

   A motion was made to recommend reappointment of Mr. Renaldo and Mr. Simms as Chair and Vice Chair. The motion was seconded and approved unanimously.

9. **Items from Other Committees**
   a. **R&A**
      i. **Item 24-18 –** Definition of Controlled Fill (P. Gilston as PM)
         1. A motion was made to accept the proposal as written. The motion was seconded and approved unanimously.
   b. **Installation**
      i. **Item 25-07** – Organic fluid relief valves are installed with discharge to 55 gallon drum (D. Patten as PM)
         1. The proposal for this item will be sent as a letter ballot for SG and SC PRD.

10. Interpretation Requests

Item Number: 24-38	**NBIC Location: Part 4, 2.5.4.2 & Part 1, 3.9.1.6 c)**	**No Attachment**

General Description: T&P relief device installation on modular HWH supply header

Task Group: None assigned.

Explanation of Need: 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.

January 2026 Meeting Action: This is an intent interpretation. This cannot move forward until the associated action item has been approved.

Item Number: 24-46	**NBIC Location: Part 4, 4.3.1 a)**	**No Attachment**

General Description: Replacement of Bodies and Transfer of Nameplates During Repair

Task Group: None assigned.

Explanation of Need: 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.

January 2026 Meeting Action: This is an intent interpretation. This cannot move forward until the associated action item (24-72) has been approved.

New Interpretation Requests:

Item Number: 25-47	**NBIC Location: Part 4, 3.3.3.4 i) 1)**	**Attachments Page 2**

General Description: T/O Testing in place.

Task Group: None assigned.

Explanation of Need: Clarification of new statement in 2025 NB-23.

January 2026 Meeting Action: A proposal was presented and revised. A motion was made to accept the revised proposal. The motion was seconded and approved unanimously.

Item Number: 25-80	**NBIC Location: Part 4, 4.11**	**Attachments Page 3-4**

General Description: Level of Independence required for NBIC Pressure Relief Valve Repair Program

Task Group: None assigned.

Explanation of Need: By understanding the National Board of Boiler Inspectors (NBBI) specific intentions when using the term "audit", Canadian Nuclear Safety Commission (CNSC) staff can interpret alignment and harmonize application of the NBIC in Canada with the existing terminology and requirements in the licensing basis of Canadian NPPs

January 2026 Meeting Action: 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.

11. Action Items

Item Number: NB15-0315	**NBIC Location: Part 4, 2.6.6 and 2.7.6 and Part 1, 4.5.6 and 5.3.6**	**No Attachment**

General Description: Review isolation Valve Requirements, and reword to allow installation of pressure relief devices in upstream piping.

Task Group: B. Nutter (PM), A. Renaldo, D. Marek, K. Beise, I. Flynn

January 2026 Meeting Action: Progress report. Work continues on this item. PM informed the group that the NBIC Location needed to be updated to align with current NBIC edition. I. Flynn was added to the task group. D. DeMichael resigned from the task group.

Item Number: 19-83	**NBIC Location: Part 4, Part 1**	**Attachments Page 5-6**

General Description: Address alternate pressure relief valve mounting permitted by ASME CC2887-1.

Task Group: D. Marek (PM), T. Patel, J. Ball, J. Aguirre

January 2026 Meeting Action: A proposal was presented and revised. A motion was made to accept the revised proposal. The motion was seconded and approved unanimously. The proposal will go to SG and SC Installation. R. Ceccarelli resigned from the task group and J. Aguirre was added to the task group.

Item Number: 21-08	**NBIC Location: Part 4, S4.4**	**No Attachment**

General Description: Additional guidance for tank vent repairs

Subgroup: PRD
Task Group: H. Cornett, B. Nutter (PM), K. Beise, J. Grace

Explanation of Need: 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.

January 2026 Meeting Action: Progress report. Work continues on this item. D. DeMichael resigned from the task group.

Item Number: 22-09	**NBIC Location: Part 4, 4.6.1**	**No Attachment**

General Description: Add language to NBIC Part 4 for valves manufactured to Code Case 2787

Subgroup: PRD

Task Group: A. Donaldson (PM), H. Cornett, B. Nutter, T. Tarbay, J. Simms, T. Patel

Explanation of Need: 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).

January 2026 Meeting Action: Progress report. Work continues on this item. The PM indicated that the task group is waiting for CC 2787 to be adopted into Section XIII

Item Number: 22-20	**NBIC Location: Part 4, 3.2.2**	**No Attachment**

General Description: Inspection and testing of PRV's located above isolation valves.

Subgroup: PRD

Task Group: D. Marek (PM), K. Beise, J. Ball, E. Creaser, H. Cornett, A. Renaldo, N. Bailey, D. Mosley, B. Nutter

Explanation of Need: 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.

January 2026 Meeting Action: A proposal was presented and a discussion was held. The proposal will be revised further by the task group. N. Bailey, D. Mosley, and B. Nutter were added to the task group. The NBIC location was updated to align with the current NBIC edition.

Item Number: 23-32	**NBIC Location: Part 4, 3.3 and Supp. 6**	**No Attachment**

General Description: Rules for T/O activities related to Nuclear Class Valves

Subgroup: PRD

Task Group: E. Creaser (PM), P. Dhobi, D. McHugh, J. Simms

Explanation of Need: 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.

January 2026 Meeting Action: Progress report. Work continues on this item.

Item Number: 24-35	**NBIC Location: Part 4, 4.6.2**	**No Attachment**

General Description: Update Testing of UV-Designated Steam valves on Air to match ASME XIII

Subgroup: PRD

Task Group: T. Beirne, B. Nutter, N. Bailey, B. DeKeyzer, D. Marek, A. Donaldson, C. Turner, H. Cornett (PM), T. Patel, and I. Flynn

Explanation of Need: 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.

January 2026 Meeting Action: Progress report. A proposal was presented, and a brief discussion was held. A revised proposal will be sent to letter ballot for SG and SC PRD between meetings.

Item Number: 24-72	**NBIC Location: Part 4, 4.3.1**	**No Attachment**

General Description: Add Language to Address Replacement of Valve Bodies and Bases

Subgroup: PRD

Task Group: A. Donaldson (PM), G. Salwan, E. Creaser, H. Cornett, B. Nutter, P. Dhobi, T. Tarbay, T. Patel

Explanation of Need: 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.

January 2026 Meeting Action: Progress report. A proposal will be sent to letter ballot for SG and SC PRD between meetings.

Item Number: 24-91	**NBIC Location: Part 4, 3.2.3**	**No Attachment**

General Description: Require means to prevent safety valve discharge piping blockage for LCDSV

Subgroup: PRD

Task Group: A. Renaldo (PM), J. Simms, D. Schirmer, D. Sullivan, J. Aguirre, D. Marek

Explanation of Need: 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.

January 2026 Meeting Action: Progress report. Work continues on this item. R. Ceccarelli has resigned from the task group. J. Aguirre and D. Marek were added to the task group.

Item Number: 24-101	**NBIC Location: Part 4, Sections 3 and 4**	**No Attachment**

General Description: Revise NBIC to expand VR and T/O programs beyond ASME Certified Valves

Subgroup: PRD

Task Group: E. Creaser (PM), D. Marek, T. Beirne, H. Cornett, K. Beise, R. Viers, N. Bailey, A. Donaldson, D. Mosley, C. Turner, I. Flynn

Explanation of Need: 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.

January 2026 Meeting Action: A proposal for this item was sent to letter ballot for SG PRD prior to the meeting and failed. A brief discussion was held, and a revised proposal will be developed. It was noted that some edits contain scope changes which would need to be approved by the Board. Mr. Creaser to provide letter from the Board authorizing the changes to scope. D. Mosley, I Flynn, and C. Turner were added to the task group.

Item Number: 25-30	**NBIC Location: Part 4, 4.7.2 b) 3)**	**No Attachment**

General Description: Association of Repair for Pilots and Main Valves

Subgroup: PRD

Task Group: 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), T. Patel

Explanation of Need: There is currently not language tying the pilot and main valve of a pilot-operated pressure relief valve to one another following repair.

Background Information: 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.

January 2026 Meeting Action: Progress report. Work continues on this item. T. Patel was added to the task group.

Item Number: 25-38	**NBIC Location: Part 4, 3.2.5.1 and 4.6.1**	**No Attachment**

General Description: Address Testing of Pilot Valves as Complete Assembly

Subgroup: PRD

Task Group: 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)

Explanation of Need: ASME Section XIII 3.6.2 (1) and (2) 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.

Background Information: Pilot operated valves in service have been field tested by checking pilot set point without verification that the main valve will open.

January 2026 Meeting Action: Progress report. Work continues on this item. CC 3057 has been incorporated into Section XIII, so the Explanation of Need was updated.

12. New Business

Item Number: 25-36	**NBIC Location: Part 2, S8.2**	**No Attachment**

General Description: Relief valve differential percentage conflict.

Subgroup: PRD (transferred from SG Inspection)

Task Group: None assigned.

Explanation of Need: Clarification is needed to ensure a correct assessment of the recommended differential pressure percentage between the operating pressure and lifting pressure of the pressure relief valve. When making formal recommendations for corrective action due to high operating pressure differentials observed during inspections, the correct recommended value is needed to guide the adjustments necessary.

Background Information: HWH boilers observed in the field sometimes operate in excess of this differential and close to the relief valve setpoint. The conflict in example b) shows a 20 percent differential, not the apparently intended 25 percent in the introductory paragraph.

January 2026 Meeting Action: A proposal was presented. A motion was made to close the item with a letter to the inquirer from the Chair of SG PRD stating that the calculation is correct, and they misunderstood. The motion was seconded and approved unanimously.

Item Number: 25-52	**NBIC Location: Part 4, 1.3.1**	**Attachment Page 7**

General Description: Update References from ASME PTC-25 to ASME Section XIII M-V

Subgroup: PRD

Task Group: None assigned.

Explanation of Need: The current reference to PTC-25 in Part 4 1.3.1 is outdated.

Background Information: With the 2025 Edition of the ASME Code, PTC-25 has been incorporated into Mandatory Appendix V of Section XIII

January 2026 Meeting Action: A proposal was presented. The subject and background information were revised. A motion was made to approve the revised proposal. The motion was seconded and approved unanimously.

Item Number: 25-71	**NBIC Location: Part 4, 3.3.3.4 & 4.8.5.4**	**No Attachment**

General Description: Harmonize elements of QMS Requirements for T/O and VR programs

Subgroup: PRD

Task Group: None assigned.

Explanation of Need: 3.3.3.4 and 4.8.5.4 list QMS requirements for T/O and VR programs. Some wording that should be identical between the two paragraphs is different and should be brought into harmony.

Background Information: Elements of the QMS Requirements for the VR and T/O programs necessarily need to be different due to the scopes of the programs being different, however, the elements listed above should be identical and currently are not.

January 2026 Meeting Action: A proposal was presented at SG PRD. The proposal will be sent to letter ballot for SG and SC PRD between meetings.

Item Number: 25-72	**NBIC Location: Part 4, 3.4**	**Attachments page 8**

General Description: "Organization reference for annual audits of T/O"

Subgroup: PRD

Task Group: None assigned.

Explanation of Need: A simple correction to reference the proper organization.

Background Information: Review of NBIC Part 4 regarding the T/O Program, ¶ 3.4 b) uses "repair organization" to refer to the T/O Certificate Holder. The term "testing organization" is used nine times to refer to the T/O Certificate Holder.

January 2026 Meeting Action: A proposal was presented. A motion was made to accept the proposal as written. The motion was seconded and approved unanimously.

Item Number: 25-73	**NBIC Location: Part 4, 4.6.1**

General Description: "Defining set pressure for VR setting and testing"

Subgroup: PRD

Task Group: H. Cornett (PM), T. Patel, B. Nutter, I. Flynn, D. Mosley, C. Turner, N. Bailey, E. Heck, D. Marek

Explanation of Need: This change is needed to align Part 3&4 and to define set pressure under VR setting & Testing.

Background Information: In my 51 years in the Assembly & Repair of Pressure Relief Valves, I have always used the same process for establishing and documenting PRV Set Pressure. However, that method was never documented in ASME Code or NBIC until the T/O Program was instituted by the National Board. Reference NBIC Part 4, ¶ 3.3.4 c) Pressure relief valves shall be tested to confirm that the set pressure (defined as the average of at least three consecutive tests) is within the allowable tolerance specified by the applicable ASME Code section and NBIC. Test results, including test gauge identification, shall be recorded on the document referred to in 3.3.3.4 h), above.

January 2026 Meeting Action: A proposal was presented at SG PRD. The task group listed above was assigned at SG PRD to further develop the proposal.

Item Number: 25-74	**NBIC Location: Part 4, 4.3.1**

General Description: "Definition for critical replacement parts"

Subgroup: PRD

Task Group: A. Donaldson (PM), E. Heck, N. Bailey, T. Patel, I. Flynn, H. Cornett, B. Nutter

Explanation of Need: There is no definition of a critical replacement part in NBIC. This change is needed for clarification and alignment with the definition of a Critical Part.

Background Information: In the VR Program, there is a signification difference between a Critical Replacement Part and a Replacement Critical Part. ¶ 4.3.1 a) defines criticals part as, "... those that may affect the valve flow passage, capacity, function, or pressure-retaining integrity." This definition is unchanged since NB-65, 1985 Edition. If a part that does not meet the definition in ¶ 4.3.1 a), e.g. Lifting Lever, needs replacing, but is not available, the repair cannot be completed. Therefore, the Lifting Lever is "critical" to the repair. On the other hand, if a Disc, Nozzle, or Spring that does meet the definition in ¶ 4.3.1 a) needs replacing, it is a "Replacement Critical Part" as referred to in NBIC since the 2009 Edition, in ¶ S7.5 c), Replacement critical parts receiving records shall be attached or be traceable to the valve repair document (see S7.3[a]). There is no definition of a critical replacement part in NBIC.

January 2026 Meeting Action: A proposal was presented at SG PRD. The task group listed above was assigned at SG PRD to further develop the proposal.

13. Future Meetings

- July 13-16, 2026 – Salt Lake City, UT
- January 11-14, 2027 – Nashville, TN

Task Group members also scheduled several conference calls to ensure action items progress before the July 2026 meeting. Going forward, Task Group members will establish future meeting times for Action Items during committee meetings following a progress report.

14. Adjournment

A motion was made to adjourn the meeting. The motion was seconded and approved unanimously. The meeting was adjourned at 11:37 AM Central Time.

Respectfully Submitted,

Robert Viers
Secretary, Subcommittee Pressure Relief Devices

Subcommittee PRD Attendees - January 2026

MEMBERS:	Interest Category	Registered For	In Person	Remote	Not In Attendance
Adam Renaldo	Users	In Person	x		
Jay Simms	Manufacturers	In Person	x		
Robert Viers	Secretary	In Person	x		
Kim Beise	National Board Certificate Holders	Remote		x	
Henry Cornett	Manufacturers	In Person	x		
Nick Bailey	General Interest	In Person	x		
Eben Creaser	Jurisdictional Authorities	In Person		x	
Denis Demichael	General Interest			x	
Prakash Dhobi	National Board Certificate Holders	In Person	x		
Alfred Donaldson	Manufacturers	In Person	x		
Daniel Marek	Users	In Person	x		
David McHugh	General Interest		x		
Brandon Nutter	National Board Certificate Holders			x	
Thakor Patel	Manufacturers			x	
Delton Schirmer	Authorized Inspection Agencies	In Person	x		
David Sullivan	Authorized Inspection Agencies	In Person	x		
Thomas Tarbay	General Interest				
Jon Wolf	Authorized Inspection Agencies	In Person	x		

VISITORS:	Company/Title/Interest	Registered For	In Person	Remote
Juan Aguirre	FM	In Person	x	
Joel Amato	NBBI	In Person		
Scott Artrip	Cross Company	In Person	x	
John Burpee	NBBI	In Person		
Ray Ceccarelli	FM	In Person	x	
Jeff Churchill	Blue Northern Engineering	Remote		
Lee Cochran	NBBI	In Person	x	
Billy DeKeyzer	Trillium Flow Technologies	In Person		
Patric Flores	Roto-Versal	Remote		
Ian Flynn	Curtiss-Wright, Farris Engineering	In Person	x	
Jeremy Grace	Chemours	Remote		x
Erik Heck	ARI-Armaturen	In Person	x	
John Huntington	Midwest Valve Services	In Person	x	
Rajesh Kamboj	Technical Safety BC	Remote		
Bhargav Kataria	NAVINTA III Inc	Remote		
Junior Little	Cross Company	In Person	x	
John Mirjalali	Intellihot Inc.	Remote		
Darris Mosley	Occidental Petroleum	In Person	x	
Luis Ponce	NBBI	In Person		
Christa Rogers	NBBI	In Person		
Vinoth Kumar Sathasivam	Prominent Team Consultancy LLC	Remote		
Gary Scribner	NBBI	In Person		
M.A. Shah	AIS	Remote		
Clark Turner	Calder	In Person	x	
Gabe Salwan	Quality Valve	Remote		
Joseph Ball				x
Donnie LaSage	NBBI		x	

THE NATIONAL BOARD
OF BOILER AND PRESSURE VESSEL INSPECTORS

Subject:	T/O Testing in place.
NBIC Location:	2025 NBIC Part 4, 3.3.3.4 i) 1)
Statement of Need:	Clarification of new statement in 2025 NB-23.
Background Information:	N/A
Proposed Question:	Is it the intention of the NBIC that valves shall be pulled and bench tested if not tested in service using the service fluid?
Proposed Reply:	Yes or no.
Committee's Question:	Is it the intention of the NBIC that valves shall be removed from the system and bench tested if not tested in service using the service fluid?
Committee's Reply:	No.
Rationale:	Per Part 4, 3.3.3.4 n), test equipment that has been qualified and included in the QMS may be used to perform testing.

4.11

THE NATIONAL BOARD
OF BOILER AND PRESSURE VESSEL INSPECTORS

Subject:	Level of Independence required for NBIC Pressure Relief Valve Repair Program
NBIC Location:	2025 NBIC Part 4, 4.11
Statement of Need:	This interpretation is required to support the use of NB-23, *National Board Inspection Code* in Canadian Nuclear Power Plants (NPPs). By understanding the National Board of Boiler Inspectors (NBBI) specific intentions when using the term "audit", Canadian Nuclear Safety Commission (CNSC) staff can interpret alignment and harmonize application of the NBIC in Canada with the existing terminology and requirements in the licensing basis of Canadian NPPs.
Background Information:	This question pertains to the 2023 edition of ANSI/NB23, National Board Inspection Code, Part 4, Pressure Relief Devices. Part 4, 4.11, ANNUAL AUDITS. States, in part: "Upon Issuance of a Certificate of Authorization, the repair organization shall audit the Quality System of the repair program on an annual basis. The quality manual shall define the auditing criteria, scope, frequency, and methods to ensure the requirements of the NBIC and Certificate Holder's Quality System are effectively implemented." CNSC staff are seeking further interpretation with respect to the committee's intent as to who specifically within the repair organization performs the audit. Namely, is the intent: Personnel directly performing or managing the repair program? Qualified audit personnel not having direct responsibility in areas being audited? No specific intent? For non-nuclear pressure relief devices CNSC staff are agnostic about the committee's intent and are seeking interpretation. For nuclear pressure relief devices, CNSC staff believe the intent specifically requires qualified audit personnel not having direct responsibility in areas being audited and are seeking confirmation of this interpretation. The basis for the latter belief is as follows:

	For application to nuclear safety related pressure relief devices, Part 4 includes Supplement 6, PROCEDURES FOR REPAIRS OF NUCLEAR SAFETY RELATED PRESSURE RELIEF VALVES. Under this S6.2.4 b) states, in part: "The repair organization shall obtain a National Board "NR" Certificate of Authorization. The requirements for said certificate include, but is not limited to, the following. The repair organization shall: Maintain a documented quality assurance program that meets the applicable requirements of NBIC Part 3, 1.6. This program shall also include all the applicable requirements for the use of the "VR" stamp;" In turn, NBIC Part 3, 1.6 states the following: 1.6.6 QUALITY ASSURANCE PROGRAM REQUIREMENTS FOR CATEGORY 1 ACTIVITIES 1.6.6.2 QUALITY PROGRAM ELEMENTS s) Audits Audits shall be performed in accordance with written procedures or checklists by qualified audit personnel not having direct responsibility in areas being audited; (Note the preceding requirements are for Category 1 activities only, the requirements for Category 2 (1.6.7) and Category 3 (1.6.8) are identical for this specific topic).
Proposed Question:	Is the intent of the audit specified in NBIC Part 4, 4.11 for it to be performed by qualified audit personnel not having direct responsibility in areas being audited for: Non-Nuclear Pressure Relief Valves? Nuclear Pressure Relief Valves?
Proposed Reply:	Yes or no; with any applicable qualifiers.
Committee's Question:	Does NBIC Part 4, 4.11 require that the annual audit be performed by audit personnel not having direct responsibility in areas being audited?
Committee's Reply:	No
Rationale:	

ITEM 19-83 Proposal 1/7/21 - Revision 1/14/2026

NBIC PART 1

3.9 PRESSURE RELIEF VALVES

See NBIC Part 1, 3.1 for the scope of pressure retaining items covered by these requirements.

3.9.1 PRESSURE RELIEF VALVE REQUIREMENTS – GENERAL

The following general requirements pertain to installing, mounting, and connecting pressure relief valves on heating boilers.

a) All covers, caps, and plugs utilized for shipping or transport shall be removed prior to the valve being installed or placed in service
b) Ensure any wire or restraining device that was utilized during shipment is removed prior to placing the valve in service

3.9.1.1 INSTALLATION OF PRESSURE RELIEF VALVES FOR STEAM HEATING, HOTWATER HEATING, AND HOT-WATER SUPPLY BOILERS

3.9.1.1.1 PERMISSIBLE INSTALLATION

Pressure relief valves shall be located at the top side of the boiler. The top side of the boiler shall mean the highest practicable part of the boiler proper but in no case shall the safety valves be located below the normal operating level and in no case shall the pressure relief valve be located below the lowest permissible water level. They shall be connected directly to a tapped or flanged opening in the boiler, to a fitting connected to the boiler by a short nipple, to a Y-base, or to a valveless header connecting steam or water outlets on the same boiler. Coil or header type boilers shall have the pressure relief valve located on the steam or hot-water outlet end. Pressure relief valves shall be installed with their spindles vertical. The opening or connection between the boiler and any pressure relief valve shall have at least the area of the valve inlet.

a) For only low mass water tube hot water heating and hot water supply boilers of 10 gallons or less, the pressure relief valve may be installed below the lowest permissible water level of the water tube boiler or hot water heater provided all the following requirements are met:
    1) A certified sensing device listed and labeled by a nationally or internationally recognized testing laboratory is installed to automatically cut off the fuel supply if circulation through the watertube boiler is interrupted
    2) The pressure relief valve inlet is connected to a vertical section of the hot water outlet piping
    3) The pressure relief valve is installed with its spindle in the vertical position
    4) The opening or connection between the boiler and the pressure relief valve shall have an area at least equal to the nominal inside area of a Schedule 80 pipe (as defined by ASME B36.10) and of the same nominal pipe size as the inlet of the valve

NBIC PART 4

2.5 PRESSURE RELIEF VALVES FOR STEAM HEATING, HOT WATER HEATING, AND HOT WATER SUPPLY BOILERS

See NBIC Part 1, 3.2 for the scope of pressure retaining items covered by Part 4, 2.5.

2.5.1 GENERAL REQUIREMENTS

The following general requirements pertain to the installation of pressure relief valves on heating boilers.

2.5.1.1 INSTALLATION OF PRESSURE RELIEF VALVES FOR HEATING BOILERS

2.5.1.1.1 PERMISSIBLE INSTALLATION

Pressure relief valves shall be located at the top side of the boiler. The top side of the boiler shall mean the highest practicable part of the boiler proper but in no case shall the safety valves be located below the normal operating level and in no case shall the pressure relief valve be located below the lowest permissible water level. They shall be connected directly to a tapped or flanged opening in the boiler, to a fitting connected to the boiler by a short nipple, to a Y-base, or to a valveless header connecting steam or water outlets on the same boiler. Coil or header type boilers shall have the pressure relief valve located on the steam or hot-water outlet end. Pressure relief valves shall be installed with their spindles vertical. The opening or connection between the boiler and any pressure relief valve shall have at least the area of the valve inlet.

a) For only low mass water tube hot water heating and hot water supply boilers of 10 gallons or less, the pressure relief valve may be installed below the lowest permissible water level of the water tube boiler or hot water heater provided all the following requirements are met:

   1) A certified sensing device listed and labeled by a nationally or internationally recognized testing laboratory is installed to automatically cut off the fuel supply if circulation through the watertube boiler is interrupted

   2) The pressure relief valve inlet is connected to a vertical section of the hot water outlet piping

   3) The pressure relief valve is installed with its spindle in the vertical position

   4) The opening or connection between the boiler and the pressure relief valve shall have an area at least equal to the nominal inside area of a Schedule 80 pipe (as defined by ASME B36.10) and of the same nominal pipe size as the inlet of the valve

THE NATIONAL BOARD
OF BOILER AND PRESSURE VESSEL INSPECTORS

Subject:	Update References from ASME PTC-25 to ASME Section XIII ~~M-V~~
NBIC Location:	2025 NBIC Part 4, 1.3.1
Statement of Need:	The current reference to PTC-25 in Part 4 1.3.1 is outdated.
Background Information:	With the 2025 Edition of the ASME Code, PTC-25 has been incorporated into Mandatory Appendix V of Section XIII. Definitions have been incorporated into Mandatory Appendix I

Proposed Text:

1.3.1 ADDITIONAL DEFINITIONS RELATING TO PRESSURE RELIEF DEVICES

Unless otherwise specified in the NBIC, the definitions relating to pressure relief devices in ~~Section 2 of ASME PTC-25~~ASME Section XIII Mandatory Appendix I~~V~~ shall apply.

THE NATIONAL BOARD
OF BOILER AND PRESSURE VESSEL INSPECTORS

Subject:	**TO Part 4, 3.4 ANNUAL AUDITS**
NBIC Location:	NBIC Part 4, 3.4 b)
Statement of Need:	3.4 b) uses "repair organization" to refer to the T/O Certificate Holder. The term "testing organization" is used nine times to refer to the T/O Certificate Holder
Background Information:	Review of NBIC Part 4 regarding the T/O Program, ¶ 3.4 b) uses "repair organization" to refer to the T/O Certificate Holder. The term "testing organization" is used nine times to refer to the T/O Certificate Holder I am proposing Sub-Committee Pressure Relief Devices revise NBIC Part 4, ¶ 3.4 b) to reference the T/O Certificate holder as the testing organization.

Proposed Text:

b) The audit results shall be documented. Mandatory items in the ~~repair~~ testing organization's scope not performed during the annual audit period shall be documented as exceptions in the audit results.