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THE NATIONAL BOARD
OF BOILER AND PRESSURE VESSEL INSPECTORS

NATIONAL BOARD INSPECTION CODE TASK GROUP INTERPRETATIONS

Minutes

Meeting of January 13th, 2025
Charleston, SC

These minutes are subject to approval and are for 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
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1. Call to Order

Chair Seime called the meeting to order at 1:00 p.m. Eastern Time.

2. Roll call of Members and introduction of Visitors

Secretary Hellman took roll and introduced Visitors ([Attachment 1](#))

3. Check for a Quorum

All members were present, and a quorum was established.

4. Awards/Special Recognition - None

5. Announcements

- This meeting marks the end of Cycle A 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 Hyatt Place rooftop bar, the Pour Taproom.
- 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 Grand Magnolia Foyer, and lunch will be served from 11:30 a.m. to 12:30 p.m. in Sterling Hall Foyer.
- 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.

6. Adoption of the Agenda

The INTERP TG Agenda was revised with editorial corrections, updates, and changes to membership considerations. The Agenda was unanimously approved (UA) as revised.

7. Approval of the Minutes of the July 15, 2024, Meeting

The minutes are available for review on the National Board website, www.nationalboard.org, and were UA by the INTERP TG.

8. Review of Rosters

a. Membership Nominations

- b. Mr. Kiwi Derrick (Users) and Stacy Marks (AIA) were both considered and UA by the INTERP TG as members of the Standing Task Group.

c. Membership Reappointments

The following memberships are scheduled to end prior to the July 2025 meeting: Mr. Michael Carlson (Jurisdictional Authority), Mr. Phil Gilston (AIA), and Mr. Marty Toth (General Interest).

Mr. P. Gilston is resigning from the INTERP TG membership and was not reappointed.

Mr. M. Carlson and M. Toth were both UA for reappointment to the INTERP TG.

9. Interpretations

Item Number: I24-16	NBIC Location: Part 3, 2.5.3 e)	No Attachment
<p>General Description: Volumetric Examination when using alternative welding methods without PWHT</p> <p>Subgroup: Repairs and Alterations</p> <p>Task Group: M. Schaser (PM), T. McBee</p> <p>Explanation of Need: The existing language, in its current form, does not make it clear whether volumetric examination is required when using alternative welding methods. The last phrase in the sentence sends the user to paragraph 4.2 which in turn sends the user back to the original code of construction. If a weld greater than 3/8 in. did not require volumetric examination at construction, then what purpose does the last sentence serve? The phrase on the other side of “or” where volumetric examination was required at construction is self-explanatory, but 4.2 permits using alternative NDE methods, suggesting MT or PT. These two methods are currently mandated “shall be” requirements in the first sentence of 2.5.3 e). If the intent is to require volumetric examination for welds greater than 3/8 in., and welds that required volumetric examination at construction, then there should be a firm statement to this effect.</p> <p>July 2024 Meeting Action: M. Schaser presented a PR.</p> <p>Update: 12/20/24 - Passed INTERP TG LB (10-1-0). Ready for SC R&A.</p> <p>Jan. 2025 Meeting Action: Chair Seime presented this is ready for SC R&A. This is a Status update.</p>		

Item Number: I24-19	NBIC Location: Part 3, 4.2	Attachment 2
<p>General Description: NB-23 2023 Part 3, section 4, article 4.2 - Volumetric NDE on weld</p> <p>Subgroup: Repairs and Alterations</p> <p>Task Group: L. Dutra (PM), M. Quisenberry</p> <p>Explanation of Need: The inquirer has a corroded zone of about 3 feet by 6 feet on a shell and head, and the depth does not exceed the corrosion allowance. The corrosion zone included a weld that was 100% RT. Is it ok with just MT NDE or need also Volumetric NDE of all the buildup area include base metal?</p> <p>July 2024 Meeting Action: L. Dutra presented a PR.</p> <p>Update: 11/28/24 – Failed LB (1-8-0). Comments were related to I23-09 and the requirements of 4.2 (a), with proposals to reword or separating this into 2 questions.</p> <p>INTERP TG Jan. 2025 Meeting Action: Dutra presented a proposal that was revised and UA.</p>		

Item Number: I24-25	NBIC Location: Part 3, 4.4.1 e) and 4.4.2 c)	Attachment 3
<p>General Description: 4.4.1 (e) and 4.4.2 (c) NDE Methods</p> <p>Subgroup: Repairs and Alterations</p> <p>Task Group: R. Derby (PM), P. Gilston, J. Ferreira</p> <p>Explanation of Need: 4.4.1 (e) and 4.4.2 (c) permit the use of NDE to verify the integrity of the repair of alteration. NDE methods other than what is listed in the original code of construction are being used for repair and alterations in some locations throughout the US. For example, Acoustic Emission Testing (AE) in accordance with ASME Section V Article 12 has been used on power boiler (HRSG) repairs. Acoustic Emission Testing is not an NDE method that is addressed in ASME Section I or Section VIII Div.1, but it is an NDE method in the reference code ASME Section V. Some inspectors are questioning this as AE is not an NDE method used in the original code of construction.</p> <p>July 2024 Meeting Action: J. Ferreria presented a proposal which was revised. To go out as Rvw & Comment LB to INTERP TG.</p> <p>Update: INTERP TG Rvw and Comment LB in progress till 1/10/25</p> <p>INTERP TG Jan. 2025 Meeting Action: Derby presented a proposal that was revised and ultimately UA, however more discussion to be had as SG and/or SC.</p>		

Item Number: I24-34

NBIC Location: Part 3, 3.4.1

Attachment 4

General Description: Rerating using OEM's design data to waive proof testing

Subgroup: Repairs and Alterations

Task Group: K. Moore (PM), B. Hrubala

Explanation of Need: A PV built in 1990 contains heads made of Class 40 cast iron. The heads were proof tested by the OEM and determined to be suitable for 160 psi MAWP. However, the OEM certified the vessel for only 125 psi due to customer requirements. Fast forward to present day, and the vessel owner now wants to Rerate the vessel to a higher pressure. The OEM is no longer in business, but the 'R' Holder is able to obtain a copy of the original proof test report by the OEM. Can it be acceptable for the 'R' Holder to Rerate the head above 125 psi, based on OEM records stating the design is good for higher pressure, without the 'R' Holder having to perform their own separate proof test?

The 'R' Holder would not be using the OEM proof test record for any new manufacturing, only for the purposes of altering an existing vessel or part within the confines of the original design.

July 2024 INTERP TG Meeting Action: Proposal was passed with 1 abstention (J. Ferreira).

July 2024 SC R&A Meeting Action: Proposal was passed with 1 negative vote (Stacy Marks standing in for P. Shanks) and 3 abstentions (B. Boseo, P. Gilston, B. Schaefer).

NOTE: This item was presented as a Progress Report during the July 2024 Main Committee meeting.

INTERP TG Jan. 2025 Meeting Action: K. Moore presented. M. Wadkinson discussed proof testing, and after discussion, the TG decided to send a **Letter to Inquirer that this is OUTSIDE THE SCOPE OF THE NBIC – UA.**

Item Number: I24-36

NBIC Location: Part 3, 3.4

No Attachment

General Description: Alteration of Plate Heat Exchanger

Subgroup: Repairs and Alterations

Task Group: T. Seime (PM)

Explanation of Need: This question is asked frequently by Repair firms that want to increase the number of heat transfer plates.

July 2024 Meeting Action: Proposal was revised and accepted with 3 abstentions (G. Galanes, J. Ferreira, M. Toth).

NOTE: This item was presented as a Progress Report during the July 2024 Main Committee meeting.

INTERP TG Jan. 2025 Meeting Action: T. Seime presented. After much discussion and revisions regarding the limitations of the original code of construction, the pending vote on the proposal failed with only 5 approvals. M. Quisenberry, T. McBee, and M. Wadkinson were added to the TG. **This was a PR.**

Item Number: I24-40	NBIC Location: Part 3, 3.3.2 e)	No Attachment
<p>General Description: Routine repair vs Alteration</p> <p>Subgroup: Repairs and Alterations</p> <p>Task Group: M. Carlson (PM), D. Kinney</p> <p>Explanation of Need: Some people use rules of thumb outside of the NBIC definition to make decision, these rules of thumb do not align with the written rules and cause project delays and extended outages.</p> <p>July 2024 Meeting Action: M. Carlson presented a PR.</p> <p>Update: Passed INTERP TG LB 11/23/24 (10-3-1). Ready for SC.</p> <p>Jan. 2025 Meeting Action: Seime presented this passed LB and is ready to SC. – Status Update.</p>		

Item Number: I24-44	NBIC Location: Part 3, 2.5.3	No Attachment
<p>General Description: Alternative weld methods and special services</p> <p>Subgroup: Repairs and Alterations</p> <p>Task Group: R. Derby (PM), P. Gilston</p> <p>Explanation of Need: In section VIII Div.1 construction some special service conditions as described in UW-2 make mandatory PWHT when it is not otherwise required for the actual thickness of material and P-number. This subtlety leads some to believe that the use of the Alternative weld methods is either not allowed or that they can only be conducted as an alteration.</p> <p>July 2024 Meeting Action: P. Gilston presented a PR. To be LB to INTERP TG when ready.</p> <p>Update: Rvw & Comment LB ended 11/20/24</p> <p>INTERP TG Jan. 2025 Meeting Action: R. Derby presented a PR with the intention to submit a proposal for a LB in the near future.</p>		

- L. Dutra substituted for B. Boseo for membership voting.

Item Number: I24-50	NBIC Location: Part 3, 2.2.1 and 2.2.3	Attachment 5
<p>General Description: Post Qualification of Welders and WPS/PQR</p> <p>Subgroup: Repairs and Alterations</p> <p>Task Group: K. Moore (PM), B. Hrubala</p> <p>Explanation of Need: There are numerous instances in our organization where welders and WPS/PQR are being qualified after repairs have been done and the equipment were put back into service. The argument they give is that if the results pass then it's acceptable.</p> <p>July 2024 Meeting Action: Close w/Letter to Inquirer that this is outside the scope of the NBIC.</p> <p>NOTE: During the Subcommittee R&A meeting, K. Moore indicated that the proposal will be revised based on additional TG discussions.</p> <p>INTERP TG Jan. 2025 Meeting Action: B. Hrubala presented multiple options and the ultimate decision was UA to send a Letter to Inquirer that this is Consulting.</p>		

New Interpretation Requests:

Item Number: I24-27	NBIC Location: Part 3 (formerly Part 2, 5.2.1)	Attachment 6
<p>General Description: Replacement of Repair Nameplate</p> <p>Subgroup: Repairs and Alterations</p> <p>Task Group: None assigned.</p> <p>Explanation of Need: There is a lack of clarity for replacing an Repair Nameplate that has become lost , illegible, or detached, and the stamping/markings required.</p> <p>July 2024 Meeting Action: From Subcommittee Inspection’s July 2024 meeting → The SG reviewed this Interpretation, and after a lot of discussion they believe this interpretation should be moved to be a Repairs & Alterations item. The information being questioned is not addressed in Part 2. After discussion, the SC agreed with the SG’s decision to move this item to R&A.</p> <p>INTERP TG January 2025 Meeting Action: Seime presented that this is not an issue and moved to Close w/No Action. The motion was UA.</p>		

Item Number: I24-99	NBIC Location: Part 3, 5.2..2 c)	Attachment 7
<p>General Description: Preparation of Form R-2 Construction Scope</p> <p>Subgroup: Repairs and Alterations</p> <p>Task Group: M. Schaser (PM), J. Ferreira</p> <p>Explanation of Need: Disposition if NDE and pressure testing is considered construction activity and R-2 fields "7-b", Construction Certification, and Certificate for Inspection are required.</p> <p>INTERP TG January 2025 Meeting Action: Seime presented. Discussion on the definition of “Construction’ from ASME vs NBIC was discussed (includes NDE and Testing per ASME vs NOT included per NBIC). The INTERP TG UA decided to send a Letter to Inquirer referencing Interps 01-38 & 01-39 and a statement that the 2025 Edition revisions will clarify the issue.</p>		

Item Number: I24-107	NBIC Location: Part 3, 3.3.3 j)	Attachment 8
<p>General Description: Addition of a nozzle details</p> <p>Subgroup: Repairs and Alterations</p> <p>Task Group: Matt Schaser (PM)</p> <p>Explanation of Need: As this sort of configuration is compliant with the original Code Of Construction and guidance is supplied by an industry-recognized document on repair of pressure equipment, it isn’t clear why it would be prohibited. When properly engineered and correctly installed, this sort of alteration could extend the life of damaged vessels.</p> <p>INTERP TG January 2025 Meeting Action: M. Schaser presented. After discussion regarding the original code of construction the TG UA a motion to send a Letter to Inquirer that this is Consulting.</p>		

10. Future Meetings

- July 7-10, 2025 – Cincinnati, OH
- January 12-15, 2026 – New Orleans, LA

11. Adjournment @ 3.35 PM EST by Chair Seime.

Respectfully submitted,

Terrence Hellman

Terrence Hellman, TG Interpretations Secretary



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

PROPOSED INTERPRETATION

Item No. 24-19
Subject/Title NB-23 2023 Part 3, section 4, article 4.2 - Volumetric NDE on weld
Project Manager and Task Group Louis Dutra, Michael Quisenberry
Source (Name/Email) Guy Ouellet / Guy.Ouellet@valero.com
Statement of Need Is it ok with just MT NDE or need also Volumetric NDE of all the build up area include base metal.
Background Information We have a corroded zone of about 3 feet by 6 feet on the shell and head and the depth do not exceed the corrosion allowance. The corrosion zone included a weld that was 100% RT.
Proposed Question Does weld buildup of an existing weld subject to volumetric NDT during construction require volumetric NDT if the repair depth is within the corrosion allowance?
Proposed Reply No, provided all three conditions of 4.2 (a), 1,2 and 3 are met.
Committee's Question 1 If weld metal buildup does not meet all requirements of NBIC Part 3, 4.2 a), is volumetric NDE required to be performed?
Committee's Reply 1 Yes.
Rationale
Committee's Question 2
Committee's Reply 2
Rationale



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PROPOSED INTERPRETATION

Item No. I24-25
Subject/Title 4.4.1 (e) and 4.4.2 (c) NDE Methods
Project Manager and Task Group: Robert Derby
Source (Name/email) Jon Ferreira / jonathan_ferreira@hsb.com
Statement of Need There seems to be some confusion by inspectors and R certificate holders of what NDE methods are acceptable when NDE is used in lieu of a pressure test. The proposed questions will provide clarity on this matter.
Background Information 4.4.1 (e) and 4.4.2 (c) permit the use of NDE to verify the integrity of the repair of alteration. NDE methods other than what is listed in the original code of construction are being used for repair and alterations in some locations throughout the US. For example, Acoustic Emission Testing (AE) in accordance with ASME Section V Article 12 has been used on power boiler (HRSG) repairs. Acoustic Emission Testing is not an NDE method that is addressed in ASME Section I or Section VIII Div.1, but it is an NDE method in the reference code ASME Section V. Some inspectors are questioning this as AE is not an NDE method used in the original code of construction.
Proposed Question 1 May NDE methods not addressed in the original code of construction be used to verify the integrity of the repair of alteration?
Proposed Reply Yes, provided the NDE method selected can provide meaningful results
Proposed Question 2 If the answer to question 1 is yes, is it required for the NDE method that is selected to have a written procedure following ASME Section V or another recognized national or international standard for the NDE method in question?
Proposed Reply Yes
Proposed Question 3 If an NDE method that is not addressed in the original code of construction is used, do the NDE personnel performing the NDE method need to be certified to a written practice?
Proposed Reply Yes

Committee's Question 1

When using NDE in lieu of pressure testing per NBIC Part 3, 4.4.1 e) and 4.4.2 c), may any NDE method be used to verify the integrity of a repair or alteration if they can provide meaningful results and have the acceptance of the Inspector and, where required, the jurisdiction?

Committee's Reply 1

Yes

Rationale

Committee's Question 2

If the answer to question 1 is "yes", is it required for the NDE method that is selected to have a written procedure following ASME Section V or another recognized national or international standard for the NDE method in question, and shall the NDE personnel performing the NDE method be certified to a written practice?

Committee's Reply 2

Yes.

Committee's Question 3

Committee's Reply 3

VOTE							
COMMITTEE	Approved	Disapproved	Abstained	Not Voting	Passed	Failed	Date



PROPOSED INTERPRETATION

Item No. 24-34
Subject/Title Rerating using OEM's design data to waive proof testing
Project Manager and Task Group
Source (Name/Email) Greg Francisco / greg.francisco@wrightspec.com
Statement of Need My company, Wrightspec LLC, is planning to apply for a 'R' Certificate in order to support field & shop Repairs & Alterations (Rerating) of cast iron paper machine dryers. We hold an AIA service agreement with Arise Boiler Inspection & Insurance Company and are hopeful to have an R-stamp by end of summer 2024.
Background Information A PV built in 1990 contains heads made of Class 40 cast iron. The heads were proof tested by the OEM and determined to be suitable for 160 psi MAWP. However, the OEM certified the vessel for only 125 psi due to customer requirements. Fast forward to present day, and the vessel owner now wants to Rerate the vessel to a higher pressure. The OEM is no longer in business, but the 'R' Holder is able to obtain a copy of the original proof test report by the OEM. Can it be acceptable for the 'R' Holder to Rerate the head above 125 psi, based on OEM records stating the design is good for higher pressure, without the 'R' Holder having to perform their own separate proof test? The 'R' Holder would not be using the OEM proof test record for any new manufacturing, only for the purposes of altering an existing vessel or part within the confines of the original design.
Proposed Question Can a 'R' Certificate Holder use an OEM's original design documents (drawings, calculations, U-1A form, proof test records) to support a Rerate of a pressure vessel in cases where the OEM is either no longer in business, but the 'R' Holder is able to obtain copies of the original design documents which support that Rerating is possible?
Proposed Reply Yes, a non-manufacturing 'R' Holder may utilize an OEM's design and test records for rerating existing in-service PV's so long as the physical condition of the vessel is suitable for increased MAWP, there are no physical changes to geometry, and the new/higher MAWP does not exceed that which is recorded on the OEM proof test report.
Committee's Question 1 Can a 'R' Certificate Holder use an OEM's original calculations when rerating a pressure vessel?
Committee's Reply 1 No
Rationale 3.4.1 a)
Committee's Question 2 Can a 'R' Certificate Holder use an OEM's original proof test records when rerating a pressure vessel?
Committee's Reply 2 No
Rationale 3.4.1 d)

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.



PROPOSED INTERPRETATION

Item No. 24-50
Subject/Title Post Qualification of Welders and WPS/PQR
Project Manager and Task Group
Source (Name/Email) Marthinus George / thinus.george@gmail.com
Statement of Need There are numerous instances in our organization where welders and WPS/PQR are being qualified after repairs have been done and the equipment were put back into service. The argument they give is that if the results pass then it's acceptable.
Background Information A high pressure heat exchanger needed critical repairs during a turnaround after inspections revealed cracks in the tubes. It was decided by the technical team to cut shorten the tubes to remove the cracks and then reweld them. The repair organization did not have a PQR, or welders qualified to weld the material combination as it was an Inconel 625 tube sheet and TP 321H tubes. The user refused to wait the 8 weeks for the repair organization to qualify this PQR and welders and opted to do the qualification after production welding and withhold certification of the repair until after PQR and welder's tests results have been accepted.
Proposed Question Does the Code allow for qualifying welder performance and welding procedures after production or even in parallel to production welding?
Proposed Reply The referencing sections 2.2.1 and 2.2.3 refers to the original code of construction / construction standard for welding procedure and welder performance qualifications. If those standards don't explicitly allow post qualification, then it is also subsequently prohibited by this Code.
Committee's Question 1
Committee's Reply 1
Rationale
Committee's Question 2
Committee's Reply 2
Rationale

VOTE:

COMMITTEE	Approved	Disapproved	Abstained	Not Voting	Passed	Failed	Date

CODE INTERPRETATIONS

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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:

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A request seeking the rationale for code requirements.

Interpretation Item 24-27

3/1/2024

Subject: Replacement of Repair Nameplate

Location: Part: Inspection; Section: 5; Paragraph: 5.2.1

Statement of Need:

There is a lack of clarity for replacing a Repair Nameplate that has become lost, illegible, or detached, and the stamping/markings required.

Background:

There is a lack of clarity for replacing a Repair Nameplate that has become lost, illegible, or detached, and the stamping/markings required.

Proposed Question:

1. Q1- Does the replacement of a Repair Nameplate require the manufacturer of the pressure-retaining item be contacted per 5.2.1 a)?
2. Q2 - Is the "R" Stamp required to be on a "Replacement" Repair Nameplate?
3. Q3 - May an "R" Cert. Holder other than the original company whose repair nameplate is being replaced, stamp their own "R" Stamp on a "Replacement" repair nameplate?

Proposed Reply:

1. A1-No. The original manufacturer has no bearing on the repair nameplate.
2. A2-No. Only the original organization that made the "R" Stamp repair on the date indicated on the original repair nameplate may stamp the "R" Certificate symbol for a repair in accordance with the NBIC.
3. A3-No.

Committee's Question:

Committee's Reply:

Rationale: Replacement of repair nameplates are not addressed in Part 2.



PROPOSED INTERPRETATION

Item No. 24-99
Subject/Title Preparation of Form R-2 Construction Scope
Project Manager and Task Group Matt Schaser (mschaser@e2g.com)
Source (Name/Email) Michael Lieb (mjlieb@nooter.com)
Statement of Need Disposition if NDE and pressure testing is considered construction activity and R-2 fields "7-b", Construction Certification, and Certificate for Inspection are required.
Background Information Re-rate performed on ASME Section VIII Division 1 pressure vessel where NDE (Ultrasonic and liquid penetrant) along with a liquid pressure test were performed. R certificate holder only performed design and no construction activities. Design Certification and Certification of Design Change Review sections are completed leaving the remaining sections blank.
Proposed Question When the same R certificate holder performs a re-rate utilizing form R-2 and no physical changes are made only performing NDE and pressure testing, must the Construction Certification and Certificate for Inspection sections of form R-2 be completed when the Design Certification and Certification of Design Change Review sections are completed.
Proposed Reply Yes, fields 7b, Construction Certification, and Certificate for Inspection are required or No, only Design Certification and Certification of Design Change Review sections are required.
Committee's Question 1 Letter to Inquirer referencing Interps 01-38 & 01-39 with note that the 2025 Edition will clarify this issue.
Committee's Reply 1 See below
Rationale See Below
Committee's Question 2
Committee's Reply 2
Rationale

VOTE:

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COMMITTEE	Approved	Disapproved	Abstained	Not Voting	Passed	Failed	Date

CODE INTERPRETATIONS

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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:

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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. 24-107
Subject/Title Addition of a nozzle details
Project Manager and Task Group Matt Schaser (mschaser@e2g.com)
Source (Name/Email) Michael Lieb (mjlieb@nooter.com)
Statement of Need Further guidance on this section.
Background Information Certificate holder would like to install a new nozzle into vessel head. Vessel has many different nozzle designs into top head, bottom head, and shell. Nozzles are installed with reinforcement, without reinforcement, set-on, set-in, and at different angles from the vessel. Seeking more definition on NBIC "located in a similar part of vessel" and "identical" to one of original design. Certificate holder would like to utilize a nozzle design on vessel head at a different arc on the head where the nozzle's axis will be different from the head. Vessel is vertically oriented and current nozzle is connected to head on a horizontal axis. New nozzle would be installed vertically.
Proposed Question When installing a new nozzle when reinforcement is a consideration, 1) does the statement "located in a similar part of the vessel" mean it must be from the head or shell and utilized on the head or shell? If yes, must the design for the nozzle on the head be located on a similar arc of the head? 2) does the statement "identical" mean every aspect of the nozzle design must be copied? Would a current nozzle without reinforcement be utilized for installation with reinforcement? 3) does the orientation or angle of the nozzle from its axis limit its use for this intention?
Proposed Reply Further guidance is requested on the above three items. Yes or no responses with some guidance would be expected proposed reply.
Committee's Question 1 Letter to Inquirer that this is "Consulting".
Committee's Reply 1
Rationale
Committee's Question 2
Committee's Reply 2
Rationale

VOTE:

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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.