

Date Distributed:



*THE NATIONAL BOARD
OF BOILER AND PRESSURE VESSEL INSPECTORS*

NATIONAL BOARD INSPECTION CODE TASK GROUP INTERPRETATIONS

MINUTES

Meeting of January 17th, 2022
San Diego, CA

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

The National Board of Boiler & Pressure
Vessel Inspectors 1055 Crupper Avenue
Columbus, Ohio 43229-
1183
Phone: (614)888-8320
FAX: (614)847-1828

1. Call to Order

Chair Seime called the meeting to order at 1:00 PM Pacific Time held in Riviera on the third floor of the hotel.

2. Roll call of Members and introduction of Visitors Secretary Hellman called roll of the Members and held introductions of visitors

3. Check for a Quorum Secretary Hellman verified a quorum was reached. ([Attachment](#))

4. Awards/Special Recognition

5. Announcements

- The National Board will be hosting a reception on Wednesday evening from 5:30pm to 7:30pm at The Smoking Gun.
- The National Board will be hosting a breakfast and lunch for the Main Committee meeting on Thursday. Breakfast will be served from 7:00am to 8:00am, and lunch will be served from 11:30am to 12:30pm. Both meals will be served at the hotel in Le Fontainebleau.
- A coffee station will be provided outside of the meeting rooms on each floor.

6. Adoption of the Agenda as revised The Agenda was accepted unanimously.

7. Approval of the Minutes of the July 12th, 2021 Meeting

The minutes are available for review on the National Board website, www.nationalboard.org. The Minutes were motioned, seconded, and unanimously approved.

8. Review of Rosters

a. Membership Nominations

None

b. Membership Reappointments

None

c. Officer Nominations

i. Nominations for Vice Chair:

- Don Kinney was nominated for VC of the INTERP TG. (K. Moore) – Unanimously Approved

9. Presentation

a. Definitions of the vote categories by Marty Toth

b. Workflow and expectations

- i.** Participation and progress on items
- ii.** Membership requirements
- iii.** Attendance in meetings, on TG and letter balloting
- iv.** Go over the newer numbering system
- v.** Expectation of work in between meetings

10. Interpretations

Item Number: I20-78	NBIC Location: Part 3, 3.3.3 s) & 3.4.4 d)	No Attachment
General Description: Repairs and Alterations of Tube Bundles		
Subgroup: Repairs and Alterations		
Task Group: Paul Shanks		
Explanation of Need: Submission is for R Certificate Holders we provide Repair Inspection services for. NBIC Part 3, 3.3.3 s) seems to allow to be a repair, but under 3.4.4 d) where the dimensions change it might be classified as an alteration.)		
July INT TG Action: P. Shanks presented that this is still being held back. Progress Report till 21-12 is resolved.		
July Meeting Action: P. Shanks presented that this is still being held back. Progress Report till 21-12 is resolved.		
January INT TG 2022 Meeting Action: P. Shanks presented that this is still being held back. Progress Report till 21-12 is resolved.		

Item Number: I21-28	NBIC Location: Part 3, 1.5.1 & 3.3.3 c)	Attachment
General Description: Subcontracted Weld-Overlay Repair		
Subgroup: Repairs and Alterations		
Task Group: Walter Sperko (PM), M. Quisenberry		
Explanation of Need:		
(1) To clarify whether it is permitted for an "R" Certificate of Authorization Holder to subcontract weld-overlay repair to another company who does not possess an "R" Certificate.		
(2) To clarify whether a subcontractor's shop used on a regular basis may be considered as a field location to allow welding by and under the control of the "R" Certificate Holder at that shop.		
July Meeting Action: Trevor Seime presented a PR		
INT TG January 2022 Meeting Action: M. Quisenberry presented. Discussion from B.W. and M. Toth was held regarding PRT stamping, shop vs field activities, and referencing the use of welders not in your employ. K. Moore commented that this would open too much ambiguity for the Stamp Holder. The original request was reviewed and a Committee's Question and Response for both questions was drafted by the TG. The proposal was UA as revised.		

Item Number: I21-32	NBIC Location: Part 3, 4.2	Attachment
General Description: NDE requirements when repairing defects in original weld metal		
Subgroup: Repairs and Alterations		
Task Group: M. Toth (PM), B. Underwood		
Explanation of Need:		
This provision will help clarify to "R" Stamp Certificate holders and owners of pressure vessels that are in need of minor repairs to existing welds. Due to the ambiguous wording of this clause any welding on a head to shell joint may be interpreted to require volumetric inspection when the name plate is stamped RT4.		
July INT TG Action: R. Troutt presented – R. Underwood's submitted comment and P. Shanks discussion was considered. Proposal revised and unanimously approved.		
July Meeting Action: R. Troutt presented, but after much discussion Marty Toth was added to the TG, but the proposal was to be taken back for more work. This was a PR .		
INT TG January 2022 Meeting Action: M. Toth presented. Discussion was held and Mr. Robert Underwood presented a comment proposal. Mr. Eben Creaser gave background information. A21-27 was reviewed, as it was related to this initial proposal. A proposal Committee Question and Answer was drafted and UA.		

New Interpretation Requests:

Item Number: I21-39	NBIC Location: Part 3, 3.3.2 e)	Attachment
General Description: Routine repair scope		
Subgroup: Repairs and Alterations		
Task Group: P. Shanks (PM), P. Gilston		
Explanation of Need: Some R-certificate holders and AIAs are making huge (100 square feet) weld metal buildup type routine repairs on the basis that the components being built up are only 5" tubes and 3.3.2 e) 1) says welded repairs to 5" tubes are routine. As 3.3.2 e) includes "shall be limited to" shouldn't exceeding any one of the listed limitations preclude the routine repair approach.		
INT TG January 2022 Meeting Action: P. Shanks presented and issues with weld buildup vs corrosion resistance weld overlay and what is a routine repair to pipe < 5" per 3.3.2 e). The proposal was revised, and a Committee's question and answer were drafted. The proposal was Approved. M. Toth abstained.		

Item Number: 21-57	NBIC Location: Part 3, 3.3.2 a)	No Attachment
General Description: Routine Repairs of Section VIII Div 1 built to Appdx 46		
Subgroup: Repairs and Alterations		
Task Group: T. Seime (PM)		
Explanation of Need: Routine Repairs are not allowed for ASME Sect. VIII Div. 2 or 3 vessels. Routine Repairs should not be allowed for Div. 1 vessels built using the design considerations of Division 2 to establish the thickness and other design details of a component for a Section VIII, Division 1 pressure vessel.		
INT TG January 2022 Meeting Action: Closed w/No Action -Withdrawn by submitter (TH).		

Item Number: I21-60	NBIC Location: Part 3, 3.4.5.1 b)	No Attachment
<p>General Description: UDS requirements for repairs and alterations for Divisions 2 & 3</p> <p>Subgroup: Repairs and Alterations</p> <p>Task Group: G. Galanes (PM), B. Morelock</p> <p>Explanation of Need: Is it the intent of interpretation 19-14 to prohibit the R-Certificate holder from recreating a UDS while still allowing the user to create the UDS? If yes, could the R-Certificate holder serve as the user's designated agent to recreate the UDS? Although this interpretation applies specifically to alterations, would this interpretation also be applicable to performing repairs (see 3.3.5.2(a))?</p> <p>INT TG January 2022 Meeting Action: G. Galanes presented. B. Morelock indicated that Division 3 requirements may have an impact on this item and will hold it back to make changes. This was a PR.</p>		

Item Number: I21-64	NBIC Location: Part 3, 1.3.1	Attachment
<p>General Description: Repair or Alteration activity allowed prior to Certification</p> <p>Subgroup: Repairs and Alterations</p> <p>Task Group: M. Toth (PM), R. Underwood, B. W.</p> <p>Explanation of Need: Applicants for the "R" Certificate are unclear if the NBIC allows for any activities to be performed prior to certification, especially since ASME does allow it.</p> <p>January 2022 Meeting Action: M. Toth presented. Proposal was approved at INT TG but will be on the agenda for SG. Passed UA.</p>		

Item Number: I21-74	NBIC Location: Part 3, 1.3.1	No Attachment
<p>General Description: ASME Sect VIII, Div 1 Design Personnel Requirements and NBIC Repairs/Alts</p> <p>Subgroup: Repairs and Alterations</p> <p>Task Group: T. McBee (PM), P. Gilston</p> <p>Explanation of Need: Many have asked what, if any, impact the new ASME VIII-1 Appendix 47 design personnel requirements will have on NBIC repairs and alterations.</p> <p>January 2022 Meeting Action: T. McBee presented. Conversation regarding design personnel qualifications on repairs vs alterations took place. It was commented that the proposal considered may be revised based on a presentation by Luis Ponce on the impact of Appdx 47 on "R Cert. Holders tomorrow at the SG R&A meeting. This was a PR.</p>		

Item Number: I21-75	NBIC Location: Part 3, 3.3.2 e) 1)	No Attachment
General Description: Routine Repairs		
Subgroup: Repairs and Alterations		
Task Group: C. Hopkins (PM), S. Frazier		
Explanation of Need: The wording "but does not include nozzles to pressure-retaining items" could lead into interpreting the nozzle as a whole including the joint attaching the nozzle to the PRI.		
INT TG January 2022 Meeting Action: Neither Mr. Hopkins or Mr. Frazier were present to report on the item. This was a PR		

Item Number: I21-79	NBIC Location: Part 3, 3.3.3(h)(2)	No Attachment
General Description: Mechanical Replacement of Shell or Head		
Subgroup: Repairs and Alterations		
Task Group: B. Schaefer (PM), M. Quisenberry		
Explanation of Need: This interpretation and corresponding Code revision (A21-80) would provide clarity to NBIC users and address whether mechanical replacement of these components is considered a repair.		
INT TG January 2022 Meeting Action: M. Quisenberry presented a PR		

Item Number: I21-81	NBIC Location: Part 3, 3.3.6	No Attachment
General Description: Repairs/Alterations of Impact Tested Vessels (Intent Interp)		
Subgroup: Repairs and Alterations		
Task Group: B. Undewood (PM), W. Sperko, G. Galanes		
Explanation of Need: There is an urgent need to address these concerns as the repair firms cannot comply with the existing wording in 3.3.6. The purpose of this Intent Interpretation is to take the approved revisions to the 2023 NBIC Part 3 and provide immediate guidance to users involved in the repair and alteration activities of impact tested vessels.		
January 2022 Meeting Action: Related to 21-77. This was a PR to be discussed at SG R&A		

11. Future Meetings

- July 2022 – TBD
- January 2023 – TBD

12. Adjournment at 3:54 PM by Chair Sieme.

Respectfully submitted,

Terrence Hellman

Terrence Hellman

TG Interpretations Secretary

INTERPRETATION TG Attendance - January 17, 2022

MEMBERS:	Interest Category	In Person	Remote	Not In Attendance
Trevor Seime - Chair	Jurisdictional Authorities	X		
Donald Kinney - Vice Chair	Jurisdictional Authorities	X		
Patricia Becker	National Board Certificate Holders			X
Brian Boseo	General Interest	X		
George Galanes	Users	X		
Timothy McBee	Authorized Inspection Agencies		X	
Kathy Moore	National Board Certificate Holders	X		
Michael Quisenberry	National Board Certificate Holders	X		
Paul Shanks	Authorized Inspection Agencies		X	
Robert Underwood	Authorized Inspection Agencies	X		
Rick Valdez	Manufacturers	X		
Robert Wielgoszinski	Authorized Inspection Agencies	X		
Marty Toth	General Interest	X		

VISITORS:	Company/Title/Interest	In Person	Remote
Chestnut, Scott	Marathon Petroleum	X	
Gilston, Philip	GE Steam Power, Inc.	X	
Jessick, Jerry	Fusion Integrated Solutions LLC	X	
Siefert, John	EPRI	X	
Wadkinson, Melissa	Fulton Thermal Corporation	X	
Frazier, Steve	City of Seattle		
Morelock, Brian	Eastman Chemical Company		X
Bantolo, Pierre	Naval Facilities Engineering Systems Command SW Region	X	
Creaser, Eben	Province of New Brunswick, Justice and Public Safety	X	
Ferreira, Jon	The Harford Steam Boiler Inspection and Insurance Company		
FISHER, SHELLEY	NAVFAC SOUTHWEST SAN DIEGO CA	X	
Johnson, Herbert	NAVFAC EXWC	X	
Kleiss, Jeff	Lochinvar, LLC.	X	
Ponce, Luis	The National Board of Boiler and Pressure Vessel Inspectors	X	
Sendek, Dennis	NAVFAC Southwest	X	
Silva, Jesus	Naval Facilities Engineering Command (U.S Navy)	X	
Theiler, Craig	ERL, Inc. / Law Valve of Texas		
Carter, Nathan	American Welding Society		
Dacanay, Julius	State of Hawaii		
khssassi, aziz	Régie du bâtiment du Québec		
Murray, Patrick	ASME		
Schaser, Matt	The Equity Engineering Group, Inc.		
Derby, Bob	United Association		X

Blados, Jonathan	B&W		X
Carlton, Mike	Jurisdiction		X
Spuhl, Raymond	HSB		X
Shah, M.A.			X
Turner, John			X
Troutt, Rob		X	



PROPOSED INTERPRETATION

Item No. 21-28
Subject/Title Subcontracted Weld-Overlay Repair
Project Manager and Task Group Walter Sperko, Subcommittee Repairs/Alterations
Source (Name/Email) Alexander Garbolevsky / alex_garbolevsky@hsb.com
Statement of Need (1) To clarify whether it is permitted for an "R" Certificate of Authorization Holder to subcontract weld-overlay repair to another company who does not possess an "R" Certificate. (2) To clarify whether a subcontractor's shop used on a regular basis may be considered as a field location to allow welding by and under the control of the "R" Certificate Holder at that shop.
Background Information Company "A" holds ASME "U" and "U2" and National Board "R" Certificates with field extensions. During fabrication and proposed after-installation repair of ASME Code vessels they construct, Company "A" intends to send these vessels to Company "B", located across the street, for automatic laser-overlay welding and return of the vessels to Company "A". Company "B" has ASME Section IX qualified welding procedures and welding operators and does not currently hold any ASME or National Board Certificates of Authorization. NBIC Part 3, Section 1.5.1 states: "Work may be subcontracted provided controls are clearly defined for maintaining full responsibility for code compliance by the National Board repair organization certifying the work." However, NBIC Part 3, Section 3.3.3 c) considers "weld overlay" as a "Repair" and no provisions are given in the NBIC to "subcontract" a "Repair" to an organization not in possession of an "R" Certificate of Authorization, unless otherwise permitted by a Jurisdiction.
Proposed Question Question 1. May R-Certificate Holder Company "A" receive a pressure-retaining item, forward it to Company "B" for automatic weld-overlay repair, who returns the item to Company "A" to complete the repair? Question 2. Must Company "B" apply an R-stamped nameplate for the pressure-retaining item weld-overlay repair described in question (1) and prepare a Form R-1? Question 3: Upon completion of the weld-overlay repair, must Company "A" additionally apply its R-stamped nameplate and prepare a Form R-1? Question 4: If Company "A" completes the weld-overlay repair without additional welding, must Company "A" prepare a Form R-1?
Proposed Reply Reply 1: Yes, provided Company "B" has an R-Certificate of Authorization covering the work in its scope of activities. Reply 2: Yes, however, if the repair is considered "routine" a nameplate is not required. Reply 3: Yes. Company "A" must attach and refer to Company "B"'s Form R-1 in the Remarks. Reply 4: No, unless required by the Jurisdiction or requested by the end user.
Committee's Question 1 Is it permitted for an "R" Certificate of Authorization Holder to subcontract welding to another company who does not possess an "R" Certificate?
Committee's Reply 1 No.
Rationale
Committee's Question 2 May a subcontractor's shop used on a regular basis be considered as a field location to allow welding by and under the control of the "R" Certificate Holder at that shop?

Committee's Reply 2

No.

Rationale**VOTE:**

COMMITTEE	Approved	Disapproved	Abstained	Not Voting	Passed	Failed	Date
TG INTP	UA				X		1/17/22

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.

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- 3) A request seeking the rationale for code requirements.



PROPOSED INTERPRETATION

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

VOTE:

COMMITTEE	Approved	Disapproved	Abstained	Not Voting	Passed	Failed	Date

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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. 21-64
Subject/Title Repair or Alteration activity allowed prior to Certification
Project Manager and Task Group
Source (Name/Email) Terrence Hellman / thellman@nationalboard.org
Statement of Need Applicants for the "R" Certificate are unclear if the NBIC allows for any activities to be performed prior to certification, especially since ASME does allow it.
Background Information Below are references from the NB-415 and 2019 NBIC supporting A1 and A2. Per NB-415: 3.8 When all requirements have been met, a Certificate of Authorization will be issued evidencing permission to use the "R" Symbol Stamp. The Certificate of Authorization shall expire on the triennial anniversary date. Per NBIC: 1.4 ACCREDITATION a) Organizations performing repairs or alterations to pressure-retaining items shall be accredited as described in this section, as appropriate for the scope of work to be performed. 1.4.1 ACCREDITATION PROCESS a) The National Board administers accreditation programs for authorization of organizations performing repairs and alterations to pressure-retaining items in accordance with NB-415, Accreditation of "R" Repair Organizations. b) Any organization may apply to the National Board to obtain a Certificate of Authorization for the requested scope of activities. A review shall be conducted to evaluate the organization's quality system. The individual assigned to conduct the evaluation shall meet the qualification requirements prescribed by the National Board. Upon completion of the evaluation, any deficiencies within the organization's quality system will be documented and a recommendation will be made to the National Board regarding issuance of a Certificate of Authorization. c) As part of the accreditation process, an applicant's quality system is subject to a review. National Board procedures provide for the confidential review resulting in recommendations to issue or not issue a Certificate of Authorization. 1.5.1 OUTLINE OF REQUIREMENTS FOR A QUALITY SYSTEM FOR QUALIFICATION FOR THE NATIONAL BOARD "R" CERTIFICATE OF AUTHORIZATION d) Statement of Authority and Responsibility A dated Statement of Authority and Responsibility, signed by a senior management official of the organization, shall be included in the manual. Further, the Statement shall include: 1) A statement that all repairs or alterations carried out by the organization shall meet the requirements of the NBIC and the Jurisdiction, as applicable; n) Acceptance and Inspection of Repair or Alteration 1) The manual shall specifically indicate that before the work is started, acceptance of the repair/alteration shall be obtained from an Inspector who will make the required inspections and confirm NBIC compliance by signing and dating the applicable NBIC Report Form upon completion of the work.
Proposed Question Q1 - Can a new applicant's demonstration item be a welded repair to a PRI in accordance with the original code of construction prior to the applicant holding the "R" Certificate of Authorization? Q2 - Can the demonstration item in Q1 be stamped with the "R" Stamp pending a successful review if the Repair/Alteration activity is authorized by and has the required in-process involvement of the company's Repair Inspector?
Proposed Reply A1 - No. No Repair/Alteration activities can be performed prior to holding an "R" Certificate of Authorization. A2 - No.
Committee's Question 1 Can the demonstration or implementation of the Quality System of a new "R" Certificate of Authorization applicant be conducted on work in process prior to the applicant holding the "R" Certificate of Authorization?
Committee's Reply 1 Yes, if the requirements of NB-415 (ACCREDITATION OF "R" REPAIR ORGANIZATIONS) are met prior to the work being performed.

Rationale

NB-415 allows for "...current work, a demonstration mock-up, or a combination of both.", and NB-57 (*The National Board & ASME Guide for reviews (Guide)*) encourages "*The demonstration will be conducted on work in-process whenever possible...*"

Committee's Question 2

Can the demonstration or implementation of the Quality System of a new "R" Certificate of Authorization applicant being conducted on work in-process be stamped with the "R" Stamp pending a successful review if the Repair/Alteration activity is authorized by and has the required in-process involvement of the applicant's Authorized Inspection Agency?

Committee's Reply 2

No

Rationale

Per NB-415, only after all requirements have been met shall a Certificate of Authorization issued evidencing permission to use the "R" Symbol Stamp, and since an "R" stamp cannot be used by a different than that which is was issued, this would not be possible.

VOTE:

COMMITTEE	VOTE:				Passed	Failed	Date
	Approved	Disapproved	Abstained	Not Voting			

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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.

I 21-64

Q1: May the demonstration of implementation of the Quality Control System of a new "R" Certificate of Authorization applicant be conducted on work in process prior to the applicant receiving the "R" Certificate of Authorization?

R1:

Yes, provided:

(a) The activities are done with the participation and acceptance of the Authorized Inspection Agency of record.

(b) The activities shall have been performed in conformance with the Applicant's accepted quality Control program,

(c) The pressure retaining item is marked with the "R" stamp and certified only after the Applicant receives

the National Board "R" Certificate of Authorization.