



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

# **NATIONAL BOARD INSPECTION CODE TASK GROUP INTERPRETATIONS**

## **MINUTES**

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**Meeting of January 8<sup>th</sup>, 2024  
San Antonio, TX**

*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  
FAX: (614)847-1828

## 1. Call to Order

Chair Seime called the meeting to order at 1:00 p.m. Central Time in the Madero A room at the hotel.

## 2. Roll call of Members and introduction of Visitors

Secretary Hellman called roll of the Members and held introductions of visitors. ([Attachment 1](#))

## 3. Check for a Quorum

Secretary Hellman verified a quorum was reached.

## 4. Awards/Special Recognition

## 5. Announcements

- This meeting marks the end of Cycle C for the 2025 NBIC edition. The committees will have until the end of the July 2024 NBIC meeting to approve items for inclusion in the 2025 NBIC.
- The National Board will be hosting a reception on Wednesday evening from 5:30 p.m. to 7:30 p.m. in Veramendi (fourth level of the hotel).
- The National Board will be hosting breakfast and lunch on Thursday in Veramendi for those attending the Main Committee meeting. Breakfast will be served from 7:00 a.m. to 8:00 a.m. and lunch will be served 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.
- Remember to add any attachments that you'd like to show during the meeting (proposals, reference documents, power points, etc.) to the NBIC file share site ([nbfileshare.org](http://nbfileshare.org)) **prior to the meeting**.
  - Note that access to the NBIC file share site is limited to committee members only.
  - ALL power point attachments/presentations must be sent to the NBIC Secretary prior to the meeting for approval.
  - Contact Jonathan Ellis ([nbicsecretary@nbbi.org](mailto:nbicsecretary@nbbi.org)) for any questions regarding NBIC file share access.
- When possible, please submit proposals in Word format showing “strike through/underline”. Project Managers: please ensure any proposals containing text from the 2021 NBIC are updated to contain text from the 2023 NBIC.
- If you'd like to request a new Interpretation or Action item, this should be done on the National Board Business Center.
  - Anyone, member or not, can request a new item.
- As a reminder, anyone who would like to become a member of a group or committee:
  - Should attend at least two meetings prior to being put on the agenda for membership consideration. The nominee will be on the agenda for voting during their third meeting.
  - The nominee must submit the formal request along with their resume to the NBIC Secretary **PRIOR TO** the meeting. [nbicsecretary@nbbi.org](mailto:nbicsecretary@nbbi.org)
  - If needed, we can also create a ballot for voting on a new member between meetings.
- Thank you to everyone who registered online for this meeting. The online registration is very helpful for planning our reception, meals, room set up, etc. Please continue to use the online registration for each meeting. If you are here in person, and did not register, please visit the National Board website to register now. Registering will make sure we have an accurate count for the reception, breakfast, and lunch. It is also a good way to make sure we have the most up-to-date contact information.

## 6. Adoption of the Agenda

The Agenda was revised to add membership nominations and editorial corrections to items listed. The agenda was UA.

## 7. Approval of the Minutes of the July 10, 2023, Meeting

The minutes from July 10, 2023 were UA.

**8. Review of Rosters**

**a. Membership Nominations**

Mr. Bernard Hrubala (AIA) was considered for membership on the Interpretations Task Group. Mr. Hrubala's membership to the INTERP TG was UA.

**b. Membership Reappointments**

- i. None

**c. Officer Nominations**

Vice Chair (D. Kinney) is stepping down and a new Vice Chair will need to be elected. There were no volunteers.

**d. Resignations**

Don Kinney will be stepping down from INTERP. TG.

**e. Presentations**

- i. Mr. Luis Ponce, NBIC Staff gave a presentation on the NBIC policy regarding Interpretations – patents/consulting.

**9. Interpretations**

**New Interpretation Requests:**

<b>Item Number: I23-55</b>	<b>NBIC Location: Part 3, S6.8</b>	<a href="#"><b>Attachment 2</b></a>
<b>General Description:</b> DOT Supplement 6 Intent Interpretation		
<b>Subgroup:</b> Repairs and Alterations		
<b>Task Group:</b> R. Underwood (PM)		
<b>Explanation of Need:</b> The current wording in S6.8 of the 2021 and 2023 Edition of Part 3 incorrectly requires the National Board Commissioned Inspector to ALSO be a DOT Registered Inspector. The 2025 Edition is removing reference to Registered Inspector (Item 20-67). This Intent Interpretation addresses the incorrect reference to Registered Inspector and the "answer" reflects the approved wording from the 2025 Edition of Supplement 6.		
<b>January 2024 Meeting Action:</b> B. Underwood presented. -The proposal was UA.		

<b>Item Number: I23-63</b>	<b>NBIC Location: Part 3, 3.4.4 d)</b>	<b>No Attachment</b>
<p><b>General Description:</b> Replacement of Heads with Different Types</p> <p><b>Subgroup:</b> Repairs and Alterations</p> <p><b>Task Group:</b> T. McBee (PM), M. Schaser</p> <p><b>Explanation of Need:</b> 2023 NBIC revises 3.4.4 d) to effectively remove, as an "Example of Alteration", a change in dimension or contour of a pressure-retaining item that does not decrease an item's pressure retaining capability. Prior to revision, 3.4.4 d) would classify any such changes as "alterations".</p> <p><b>January 2024 Meeting Action:</b> M Schaser presented. Motion to send a letter to inquirer referencing an Action Item has been opened to address this concern and to Close this Item was UA.</p>		

<b>Item Number: I23-64</b>	<b>NBIC Location: Part 3, 3.3.3 j)</b>	<b><a href="#">Attachment 3</a></b>
<p><b>General Description:</b> Review of calculations for a new nozzle per 3.3.3 j)</p> <p><b>Subgroup:</b> Repairs and Alterations</p> <p><b>Task Group:</b> T. McBee (PM), M. Schaser</p> <p><b>Explanation of Need:</b> Example of repair 3.3.3 j) may allow for limits of reinforcement to over lap in some cases and as such is not conservative.</p> <p><b>January 2024 Meeting Action:</b> M Schaser presented. The proposal was revised and UA.</p>		

<b>Item Number: I23-65</b>	<b>NBIC Location: Part 3, 3.3.4.8 a) and 4.4</b>	<b>No Attachment</b>
<p><b>General Description:</b> Returning a vessel to service without repairing known defects</p> <p><b>Subgroup:</b> Repairs and Alterations</p> <p><b>Task Group:</b> K. Moore (PM), J. Ferreira</p> <p><b>Explanation of Need:</b> The vessel is located in the state of Texas whose laws do not address pressure vessels, and there are no jurisdictional inspection requirements. Repairs applied by the R Certificate holder to one part of the vessel are complete and acceptable. The R Certificate holder is not satisfied with leaving another part of the vessel with a known defect at the direction of the owner, who intends to return the vessel to operation in its current state. It has been explained to the repair organization that the owner is ultimately responsible for the condition and safety of the vessel and is accountable to the jurisdiction.</p> <p><b>January 2024 Meeting Action:</b> K. Moore presented a recommendation to Close w/a Letter to Inquirer that this is outside the scope of the NBIC. The motion was UA.</p>		

<b>Item Number: I23-66</b>	<b>NBIC Location: Part 3, 3.2.7</b>	<b>No Attachment</b>
<p><b>General Description:</b> Applying PWHT to a vessel not previously PWHT for a change of service</p> <p><b>Subgroup:</b> Repairs and Alterations</p> <p><b>Task Group:</b> C. Hopkins (PM), M. Carlson, G. Galanes</p> <p><b>Explanation of Need:</b> The pressure vessel is to be installed and operated in the state of Texas. The Chief Inspector reports that Texas state laws do not address pressure vessels, and has directed the user to contact the National Board for assistance. The NBIC has issued an interpretation that applying PWHT to a vessel not previously subject to PWHT is an alteration, and we agree. The NBIC does not address whether applying PWHT to such a vessel makes it unsuitable for service since the original WPSs were not qualified with PWHT. The owner intends to apply PWHT and operate the vessel in its new service application by September 1, 2023.</p> <p><b>January 2024 Meeting Action:</b> T. Seime presented a recommendation to Close w/a Letter to Inquirer that this Consulting. The motion was UA.</p>		

<b>Item Number: I23-71</b>	<b>NBIC Location: Part 3, 3.3 and 3.4</b>	<b><a href="#">Attachment 4</a></b>
<p><b>General Description:</b> New method for tube replacement: is it a repair or alteration?</p> <p><b>Subgroup:</b> Repairs and Alterations</p> <p><b>Task Group:</b> K. Moore (PM), D. Kinney, P. Becker</p> <p><b>Explanation of Need:</b> The repair/alteration method shown is used for tube replacement. This method is being done in Texas, but there is confusion on whether this method of tube replacement should be classified as a repair or an alteration.</p> <p><b>January 2024 Meeting Action:</b> R. Trout presented a proposal, which was revised. A vote was called for and 5 approved, 0 disapproved, 5 abstained (A. Triplet, T. Seime, P. Gilston, G. Galanes, M. Schaser) – Item did not pass.</p>		

<b>Item Number: I23-75</b>	<b>NBIC Location: Part 3, 4.4.2 c)</b>	<b><a href="#">Attachment 5</a></b>
<p><b>General Description:</b> NDE In Lieu of Pressure Testing for Alterations</p> <p><b>Subgroup:</b> Repairs and Alterations</p> <p><b>Task Group:</b> M. Toth (PM), L. Dutra</p> <p><b>Explanation of Need:</b> The existing language in NBIC Part 3, Section 4, Paragraph 4.4.2.c – in concert with the new definition of “practicable” added in the 2023 Edition of the Code – may confuse Repair Organizations and owners about their options when it comes to verifying a successful alteration to a pressure-retaining item.</p> <p><b>January 2024 Meeting Action:</b> M. Toth presented a proposal. The proposal was Approved. (1 abstention, A. Triplet).</p>		

<b>Item Number: I23-79</b>	<b>NBIC Location: Part 3, 2.5.3 d) and 2.5.3.6</b>	<b><a href="#">Attachment 6</a></b>
<p><b>General Description:</b> Alternative Welding Method 6 - Controlled Fill</p> <p><b>Subgroup:</b> Repairs and Alterations</p> <p><b>Task Group:</b> P. Gilston (PM), R. Derby</p> <p><b>Explanation of Need:</b> There is a lack of clarity as to the current requirement, need, and definition of controlled fill technique for application to Welding Method 6.</p> <p><b>January 2024 Meeting Action:</b> Due to lack of time, this proposal was not presented, as this proposal will go to LB.</p>		

<b>Item Number: I23-82</b>	<b>NBIC Location: Part 3, 2.5.3 d) and 2.5.3.6</b>	<b>No Attachment</b>
<p><b>General Description:</b> Replacement of non-pressure retaining parts in Electrolyzer PEM Stack</p> <p><b>Subgroup:</b> Repairs and Alterations</p> <p><b>Task Group:</b> None assigned.</p> <p><b>Explanation of Need:</b> Hydrogenics is a manufacturer of hydrogen electrolyzers which operate on PEM (Proton Exchange Membrane) technology. The PEM stack operates at 30 bar (435 PSIG) pressure and is rated for a MAWP of 40 bar (580 PSIG) and we perform pneumatic pressure tests to ensure structural integrity according to ASME Sec VIII-1. At times we see cell shortage faults occurring which is not a failure of the pressure-retaining components but of components within the pressure vessel failing due to normal wear and tear. Need to determine if our company requires the NB R Certificate holder status.</p> <p><b>January 2024 Meeting Action:</b> New Item. Taskgroup to be selected. This was a PR.</p>		

## 10. Acton Items

<b>Item Number: A23-73</b>	<b>NBIC Location: Section 10 and the NBBI Website</b>	<b><a href="#">Attachment 7</a></b>
<p><b>General Description:</b> Revise Interp 21-05 to add later ASME Editions</p> <p><b>Subgroup:</b> Repairs and Alterations</p> <p><b>Task Group:</b> T. Seime (PM), D. Kinney</p> <p><b>Explanation of Need:</b> Interp 21-05 intended to require all alterations to vessels built to ASME Sect. VIII Div. 1, 2021 Edition AND ALL FOLLOWING EDITIONS, be done by design personnel meeting the requirements of Appdx 47.</p> <p><b>January 2024 Meeting Action:</b> T. Seime presented a motion that was UA as proposed.</p>		

## 11. Future Meetings

- July 15-18, 2024 – The Brown Hotel in Louisville, KY

- January 2025 – TBD

**12. Adjournment @ 4:10 PM by Chair Seime.**

Respectfully submitted,

*Terrence Hellman*

Terrence Hellman, TG Interpretations Secretary

Session Name	Email Address	First Name	Last Name	Company Name	Registration Type	Member or Visitor
Interpretations Task Group	bmboseo@burnsmcd.com	Brian	Boseo	Burns & McDonnell Construction	In-person	M
Interpretations Task Group	camx235@lni.wa.gov	Mike	Carlson	State of Washington	In-person	M
Interpretations Task Group	rderby@uanet.org	Bob	Derby	United Association Education and Training Department	In-person	M
Interpretations Task Group	jonathan_ferreira@hsb.com	Jon	Ferreira	Hartford Steam Boiler Inspection & Insurance Company	In-person	M
Interpretations Task Group	ggalanes@diamondtechnicalservices.com	George	Galanes	DTS Inc.	In-person	M
Interpretations Task Group	philip_gilston@hsb.com	Philip	Gilston	Hartford Steam Boiler	In-person	M
Interpretations Task Group	Timothy.McBee@tuvsud.com	Timothy	McBee	ARISE	In-person	M
Interpretations Task Group	kathymoore@joemoorecompany.com	Kathy	Moore	Joe Moore & Company	In-person	M
Interpretations Task Group	michael@spartan-mech.com	Michael	Quisenberry	Spartan Boiler & Mechanical	In-person	M
Interpretations Task Group	mschaser@e2g.com	Matt	Schaser	The Equity Engineering Group, Inc.	In-person	M
Interpretations Task Group	triplett@ornl.gov	Andrew	Triplett	UT-Battelle, LLC	In-person	M
Interpretations Task Group	tsseime@nd.gov	Trevor	Seime	State of North Dakota	In-person	M (Chair)
Interpretations Task Group	don.kinney@labor.nc.gov	Don	Kinney	North Carolina Boiler Safety Bureau	In-person	M (Vice Chair)
Interpretations Task Group	jamato@nationalboard.org	Joel	Amato	NBBI	In-person	
Interpretations Task Group	lbaker@us.tuv.com	Lane	Baker	TUV Rheinland	Remote	
Interpretations Task Group	pedro.barinotto@specprogroupp.global	Pedro	Barinotto	SPECPRO GROUP	In-person	
Interpretations Task Group	pbecker@epri.com	Pat	Becker	EPRI	In-person	
Interpretations Task Group	mlboobar@firstquality.com	Matt	Boobar	First Quality Tissue	In-person	
Interpretations Task Group	benjamin.calderon@libertymutual.com	Benjamin	Calderon	Liberty Mutual Insurance	In-person	
Interpretations Task Group	kinwai.cheng@dot.gov	Alex	Cheng	US Dept of Transportation - PHMSA	In-person	
Interpretations Task Group	kevin.choi@cummins.com	Kevin	Choi	Cummins	Remote	
Interpretations Task Group	eben.creaser@gmail.com	Eben	Creaser	NB Justice and Public Safety	Remote	
Interpretations Task Group	julius.j.dacanay@hawaii.gov	Julius	Dacanay	State of Hawaii	Remote	
Interpretations Task Group	ldutra@baycityboiler.com	Louis	Dutra	Bay City Boiler	In-person	
Interpretations Task Group	steve.frazier@seattle.gov	Steve	Frazier	City of Seattle	Remote	
Interpretations Task Group	ggoossens@nationalboard.org	Greg	Goossens	NBBI	In-person	
Interpretations Task Group	william.griffith@zurichna.com	Wil	Griffith	Zurich	In-person	
Interpretations Task Group	christopher_hartford@cinfin.com	Christopher	Hartford	Cincinnati Insurance	Remote	
Interpretations Task Group	adam.henson@csb.gov	Adam	Henson	U.S. Chemical Safety Board	In-person	
Interpretations Task Group	sara@vikingvessel.com	Marshall	Hicks	Viking Vessel Services LLC	In-person	
Interpretations Task Group	marshall@vikingvessel.com	Marshall	Hicks	VIKING VESSEL SERVICES, LLC	Remote	p
Interpretations Task Group	bhrubala@us.tuv.com	Bernie	Hrubala	TUV Rheinland	In-person	
Interpretations Task Group	rajesh.kamboj@technicalsaftybc.ca	Rajesh	Kamboj	British Columbia Safety Authority	Remote	
Interpretations Task Group	aziz.khsassani@rbq.gouv.qc.ca	Aziz	Khssassi	Régie du Bâtiment du Québec	In-person	
Interpretations Task Group	steven.lombardo@ge.com	Steve	Lombardo	GE Vernova	In-person	
Interpretations Task Group	dani@isbervices.com	Daniel	Lynch	ISBS	Remote	
Interpretations Task Group	kmisiewicz@pleuneservice.com	Ken	Misiewicz	Pleune Service Company	In-person	
Interpretations Task Group	dpatten@baycityboiler.com	Donald	Patten	Bay City Boiler Co., Inc.	In-person	
Interpretations Task Group	lponce@nationalboard.org	Luis	Ponce	National Board of Boiler and Pressure Vessel Inspectors	In-person	
Interpretations Task Group	jsowinski@e2g.com	James	Sowinski	The Equity Engineering Group, Inc.	In-person	
Interpretations Task Group	rob.stimson@ks.gov	Robert	Stimson	Office of the State Fire Marshal	In-person	
Interpretations Task Group	Rob.troutt@tdlr.texas.gov	Rob	Troutt	TDLR	In-person	p
Interpretations Task Group	robert_underwood@hsb.com	Robert	Underwood	Hartford Steam Boiler	In-person	
Interpretations Task Group	jaga4021@hotmail.com	Jagadheesan	Vellingiri	APAVE SA	Remote	
Interpretations Task Group	mark.vogt@vistracorp.com	Mark	Vogt	Luminant	In-person	
Interpretations Task Group	melissa.wadkinson@fulton.com	Melissa	Wadkinson	Fulton	In-person	
Interpretations Task Group	michaeltwinters@gmail.com	Michael	Winters	Boiler & Property Consulting	In-person	
Interpretations Task Group	John@vikingvessel.com	John	MA	Viking Vessel Services LLC	In-person	
		MA	Shaw			



## 1. Summary

Meeting title	INTERPRETATION TG
Attended participants	21
Start time	1/08/24, 1:31:35 PM
End time	1/08/24, 5:12:20 PM
Meeting duration	3h 40m 45s
Average attendance time	2h 43m 25s

## 2. Participants

Name	First Join	Last Leave	In-Meeting Duration	Email	Participant ID (UPN)	Role
Terrence Hellman	1/08/24, 1:54:04 PM	1/08/24, 5:10:57 PM	3h 16m 53s	THellman@nationalboard.org	thellman@nationalboard.org	Organizer
Ehler, Donald	1/08/24, 1:54:40 PM	1/08/24, 4:13:08 PM	2h 18m 28s	Donald.Ehler@novascotia.ca	Donald.Ehler@novascotia.ca	Presenter
Triplet, Andrew	1/08/24, 1:54:41 PM	1/08/24, 5:10:06 PM	3h 15m 25s	triplett@ornl.gov	6vt@ornl.gov	Presenter
Henry, Harrington	1/08/24, 1:54:41 PM	1/08/24, 3:35:34 PM	1h 40m 52s	Harrington.Henry@tuvsud.com	henry-ha@us001.itgr.net	Presenter
Rob Stimson [KSFM]	1/08/24, 1:55:42 PM	1/08/24, 5:09:39 PM	3h 13m 56s	rob.stimson@ks.gov	rob.stimson@ksfm.ks.gov	Presenter
Mcguire, Robert (GE Vernova)	1/08/24, 1:55:42 PM	1/08/24, 5:09:54 PM	3h 14m 12s	robert.b.mcguire@ge.com	212484782@ge.com	Presenter
Kevin Choi	1/08/24, 1:58:19 PM	1/08/24, 5:10:04 PM	3h 11m 45s	kevin.choi@accelerazero.com	vx751@cummins.com	Presenter
Derks, Christopher - DSPS	1/08/24, 1:59:07 PM	1/08/24, 5:09:35 PM	3h 10m 28s	Christopher.Derks@wisconsin.gov	Christopher.Derks@wisconsin.gov	Presenter
Decker, Kevin	1/08/24, 2:00:45 PM	1/08/24, 4:54:56 PM	2h 54m 11s	Kevin_Decker@CINFIN.com	kevin_decker@cinfin.com	Presenter
Paige, Terence (GE Vernova)	1/08/24, 2:01:13 PM	1/08/24, 5:09:31 PM	3h 8m 17s	Terence.Paige1@ge.com	212485018@ge.com	Presenter
Luprete, James	1/08/24, 2:02:33 PM	1/08/24, 5:01:14 PM	2h 58m 40s	James_Luprete@cinfin.com	James_Luprete@CINFIN.COM	Presenter
Gibbs, Adrian	1/08/24, 2:03:34 PM	1/08/24, 4:00:42 PM	1h 57m 7s	adgibbs@milwaukee.gov	adgibbs@milwaukee.gov	Presenter
Rajesh Kamboj	1/08/24, 2:03:34 PM	1/08/24, 5:09:20 PM	3h 5m 45s	Rajesh.Kamboj@technicalsaftybc.ca	Rajesh.Kamboj@technicalsaftybc.ca	Presenter
Caslav Dinic	1/08/24, 2:05:25 PM	1/08/24, 4:18:03 PM	2h 12m 37s	cdinic@tssa.org	cdinic@tssa.org	Presenter
Jerry Jessick	1/08/24, 2:06:49 PM	1/08/24, 5:10:15 PM	3h 3m 26s	JJessick@fusion-etc.com	JJessick@fusion-etc.com	Presenter
M. A. Shah (Guest) boilersandpressurevessels9@gmail.com	1/08/24, 2:15:21 PM	1/08/24, 5:10:45 PM	2h 55m 23s			Presenter
Dan Lynch	1/08/24, 2:18:48 PM	1/08/24, 4:29:32 PM	2h 10m 44s	danl@isbsservices.com	danl@isbsservices.com	Presenter
Dionna Dennard	1/08/24, 2:28:16 PM	1/08/24, 5:09:57 PM	2h 41m 41s	dionna.dennard@tdlr.texas.gov	dionna.dennard@tdlr.texas.gov	Presenter
M. A. Shah	1/08/24, 2:40:59 PM	1/08/24, 5:10:09 PM	2h 29m 9s			Presenter
Eben	1/08/24, 3:03:33 PM	1/08/24, 5:12:20 PM	2h 8m 47s			Presenter
Dacanay, Julius J	1/08/24, 3:06:09 PM	1/08/24, 5:10:17 PM	2h 4m 7s	julius.j.dacanay@hawaii.gov	julius.j.dacanay@hawaii.gov	Presenter

## 3. In-Meeting Activities

Name	Join Time	Leave Time	Duration	Email	Role
Terrence Hellman	1/08/24, 1:54:04 PM	1/08/24, 5:10:57 PM	3h 16m 53s	THellman@nationalboard.org	Organizer
Ehler, Donald	1/08/24, 1:54:40 PM	1/08/24, 4:13:08 PM	2h 18m 28s	Donald.Ehler@novascotia.ca	Presenter
Triplet, Andrew	1/08/24, 1:54:41 PM	1/08/24, 5:10:06 PM	3h 15m 25s	triplett@ornl.gov	Presenter
Henry, Harrington	1/08/24, 1:54:41 PM	1/08/24, 3:35:34 PM	1h 40m 52s	Harrington.Henry@tuvsud.com	Presenter
Rob Stimson [KSFM]	1/08/24, 1:55:42 PM	1/08/24, 5:09:39 PM	3h 13m 56s	rob.stimson@ks.gov	Presenter
Mcguire, Robert (GE Vernova)	1/08/24, 1:55:42 PM	1/08/24, 5:09:54 PM	3h 14m 12s	robert.b.mcguire@ge.com	Presenter
Kevin Choi	1/08/24, 1:58:19 PM	1/08/24, 5:10:04 PM	3h 11m 45s	kevin.choi@accelerazero.com	Presenter
Derks, Christopher - DSPS	1/08/24, 1:59:07 PM	1/08/24, 5:09:35 PM	3h 10m 28s	Christopher.Derks@wisconsin.gov	Presenter
Decker, Kevin	1/08/24, 2:00:45 PM	1/08/24, 4:54:56 PM	2h 54m 11s	Kevin_Decker@CINFIN.com	Presenter
Paige, Terence (GE Vernova)	1/08/24, 2:01:13 PM	1/08/24, 5:09:31 PM	3h 8m 17s	Terence.Paige1@ge.com	Presenter
Luprete, James	1/08/24, 2:02:33 PM	1/08/24, 5:01:14 PM	2h 58m 40s	James_Luprete@cinfin.com	Presenter
Gibbs, Adrian	1/08/24, 2:03:34 PM	1/08/24, 4:00:42 PM	1h 57m 7s	adgibbs@milwaukee.gov	Presenter
Rajesh Kamboj	1/08/24, 2:03:34 PM	1/08/24, 5:09:20 PM	3h 5m 45s	Rajesh.Kamboj@technicalsaftybc.ca	Presenter
Caslav Dinic	1/08/24, 2:05:25 PM	1/08/24, 4:18:03 PM	2h 12m 37s	cdinic@tssa.org	Presenter
Jerry Jessick	1/08/24, 2:06:49 PM	1/08/24, 5:10:15 PM	3h 3m 26s	JJessick@fusion-etc.com	Presenter
M. A. Shah (Guest) boilersandpressurevessels9@gmail.com	1/08/24, 2:15:21 PM	1/08/24, 5:10:45 PM	2h 55m 23s		Presenter
Dan Lynch	1/08/24, 2:18:48 PM	1/08/24, 4:29:32 PM	2h 10m 44s	danl@isbsservices.com	Presenter
Dionna Dennard	1/08/24, 2:28:16 PM	1/08/24, 5:09:57 PM	2h 41m 41s	dionna.dennard@tdlr.texas.gov	Presenter
M. A. Shah	1/08/24, 2:40:59 PM	1/08/24, 5:10:09 PM	2h 29m 9s		Presenter
Eben	1/08/24, 3:03:33 PM	1/08/24, 5:12:20 PM	2h 8m 47s		Presenter
Dacanay, Julius J	1/08/24, 3:06:09 PM	1/08/24, 5:10:17 PM	2h 4m 7s	julius.j.dacanay@hawaii.gov	Presenter



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

### PROPOSED INTERPRETATION

<b>Item No.</b> 23-55
<b>Subject/Title</b> DOT Supplement 6 Intent Interpretation
<b>Project Manager and Task Group</b> Robert Underwood, Subcommittee Repairs/Alterations
<b>Source (Name/Email)</b> Robert Underwood / robert_underwood@hsb.com
<b>Statement of Need</b> This intent interpretation will address the incorrect information in Part 3, Supplement 6, paragraph S6.8.
<b>Background Information</b> The current wording in S6.8 of the 2021 and 2023 Edition of Part 3 incorrectly requires the National Board Commissioned Inspector to ALSO be a DOT Registered Inspector. The 2025 Edition is removing reference to Registered Inspector (Item 20-67). This Intent Interpretation addresses the incorrect reference to Registered Inspector and the "answer" reflects the approved wording from the 2025 Edition of Supplement 6, paragraph S6.6.
<b>Proposed Question</b> When performing repair and alteration activities to DOT Transport Tanks in accordance with NBIC Part 3, Supplement 6, is it the intent that the inspection and certification be made by a Registered Inspector meeting the requirements of the Competent Authority?
<b>Proposed Reply</b> No. Inspection and certification shall be made by an Inspector holding an appropriate National Board Commission as required by NBIC Part 3, 1.3.
<b>Committee's Question 1</b> When performing repair and alteration activities to DOT Transport Tanks in accordance with NBIC Part 3, Supplement 6, is it the intent that the inspection and certification be made by a Registered Inspector meeting the requirements of the Competent Authority?
<b>Committee's Reply 1</b> No. Inspection and certification shall be made by an Inspector holding an appropriate National Board Commission as required by NBIC Part 3, 1.3.
<b>Rationale</b>
<b>Committee's Question 2</b>
<b>Committee's Reply 2</b>
<b>Rationale</b>

**Relevant Revised Text for Reference:**  
**Item 20-67 – Revisions to Part 3, Supplement 6**  
Approved by Main Committee in March of 2023

## **SUPPLEMENT 6**

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

#### **S6.1 SCOPE**

This supplement provides requirements and guidelines for repairs, alterations, or modifications to DOT

Transport Tanks used for the transportation of dangerous goods via highway, rail, air, or water.

#### **S6.2 DEFINITIONS**

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

#### **S6.3 CONSTRUCTION STANDARDS**

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

#### **S6.4 ACCREDITATION AND REGISTRATION**

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

#### **S6.5 AUTHORIZATION**

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

## **S6.6 INSPECTION**

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

## **S6.7 MODIFICATIONS**

All modifications, as defined in NBIC Part 2, Supplement 6, to the pressure-retaining item shall meet the requirements of NBIC Part 3 for alterations and 49CFR180.413(b).

## **S6.8 DRAWINGS AND CALCULATIONS**

- a) Design requirements for repairs, alterations and modifications shall comply with the requirements of NBIC Part 3, 3.2.4.
- b) As appropriate, drawings or instructions shall be prepared to describe the repair, alteration, or modification. Drawings shall include sufficient information to satisfactorily perform the activity.
- c) The design of alterations and modifications shall be completed by an organization experienced in the design portion of the standard used for the construction of the item and certified by a Design Certifying Engineer as defined in NBIC Part 2, S6.17. Design documents shall be completed prior to the start of any physical work and be available for review by the Inspector accepting the design.

## **S6.95 MATERIALS**

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

## **S6.6-10 REPLACEMENT PARTS**

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

- a) ~~Replacement parts that will be subject to internal or external pressure that consist of new material which may be formed to the required shape by spinning, forging, die forming, and on which no fabrication welding is performed shall be supplied as material. Such parts shall be marked with the material and part identification and the name or trademark of the parts manufacturer. In lieu of full identification marking on the material or part, the part manufacturer may use a coded marking system traceable to the original marking. Such markings shall be considered as the part manufacturer's certification that the part complies~~

~~with the original code of construction. Examples include seamless or welded tube or pipe, forged nozzles, heads or subassemblies attached mechanically.~~

- ~~b) Replacement parts that will be subject to internal or external pressure, that are preassembled by attachment welds, shall have the welding performed in accordance with the original code of construction. This certificate shall be supplied in the form of a bill of material or drawings with statement of certification.~~
- ~~c) Replacement parts subject to internal or external pressure fabricated by welding that require shop inspection by an Authorized Inspector shall be fabricated by an organization having an appropriate ASME *Certificate of Authorization*. The item shall be inspected and stamped as required by the applicable section of the ASME Code and DOT specification requirements. A completed ASME *Manufacturer's Partial Data Report* shall be supplied by the manufacturer.~~
- ~~d) When the original code of construction is other than ASME, replacement parts subject to internal or external pressure fabricated by welding shall be manufactured by an organization certified as required by the original code of construction. The item shall be inspected and stamped as required by the original code of construction. Certification as required by the original code of construction shall be supplied with the item. When this is not possible or practicable the organization fabricating the part may have a National Board *Certificate of Authorization*. Replacement parts fabricated by an "R" stamp holder shall be documented on Form R-3 and the "R" Stamp applied as described in NBIC Part 3, S6.15.~~

## **S6.7 — AUTHORIZATION**

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

## **S6.8 — INSPECTION**

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

### **S6.8.1 — INSPECTOR DUTIES FOR REPAIRS, ALTERATIONS, AND MODIFICATIONS**

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

- ~~e) The Registered Inspector shall meet the rules of NB-263, RCI-1, Rules for Commissioned Inspectors. Additional duties are summarized below:~~
- ~~1. Verify the organization performing the repair, alteration or modification activity is properly accredited and in possession of a current valid *Certificate of Authorization* to apply the "R" Stamp issued by the National Board and is working to an accepted Quality Control System;~~
  - ~~2. Verify that the design, if required, for the modification of the vessel is approved by a Design Certifying Engineer, or Designated Approval Agency or other applicable individual;~~
  - ~~3. Verify the materials to be used to make the repair, alteration, or modification are approved for use and comply with applicable code requirements;~~
  - ~~4. Verify the welding procedures and welders or welding operators are properly qualified;~~
  - ~~5. Verify that all heat treatments, if required, including PWHT have been performed in accordance with the applicable standards and that the results are acceptable;~~
  - ~~6. Verify that all NDE, impact tests, and other tests have been performed when required, and that they are acceptable;~~
  - ~~7. Make a visual inspection of the work performed to confirm there are no visible defects or deviations from code requirements;~~
  - ~~8. Perform external and internal visual inspections, if the vessel is equipped with a manway, and witness the hydrostatic or pneumatic pressure test and/or leak tightness test when they are required;~~
  - ~~9. Verify the correct nameplate is properly attached to the vessel and that the current test and inspection markings are properly attached and displayed on the proper vessel;~~
  - ~~10. Sign the Form R-1 and, as appropriate, form R-2 when work is completed.~~



### PROPOSED INTERPRETATION

<b>Item No.</b> 23-64
<b>Subject/Title</b> Review of calculations for a new nozzle per 3.3.3 j)
<b>Project Manager and Task Group</b>
<b>Source (Name/Email)</b> Paul Shanks / paul.shanks@bureauveritas.com
<b>Statement of Need</b> Example of repair 3.3.3 j) may allow for limits of reinforcement to over lap in some cases and as such is not conservative.
<b>Background Information</b> Code case 2695, formerly and Mandatory Appendix 46, currently allow section VIII Div.1 certificate holders to use the opening reinforcement methods as listed in Section VIII Div.2 on Div.1 vessels. Section VIII div.2 stipulates that for a set through nozzle the limit of reinforcement is measure radially from the OD of a nozzle, Given that the limit of reinforcement is nominally equal to the inside diameter of the opening, two set through nozzle openings that have their centers 3 inside diameters apart may have unacceptable overlapping limits of reinforcement.
<b>Proposed Question</b> In 3.3.3 j) is diameter taken to mean outside diameter?
<b>Proposed Reply</b> Yes
<b>Committee's Question 1</b> In 3.3.3 j) does the diameter refer to the outside diameter of the nozzle?
<b>Committee's Reply 1</b> No, the diameter used shall be the diameter referenced in the original code of construction.
<b>Rationale</b>
<b>Committee's Question 2</b>
<b>Committee's Reply 2</b>
<b>Rationale</b>

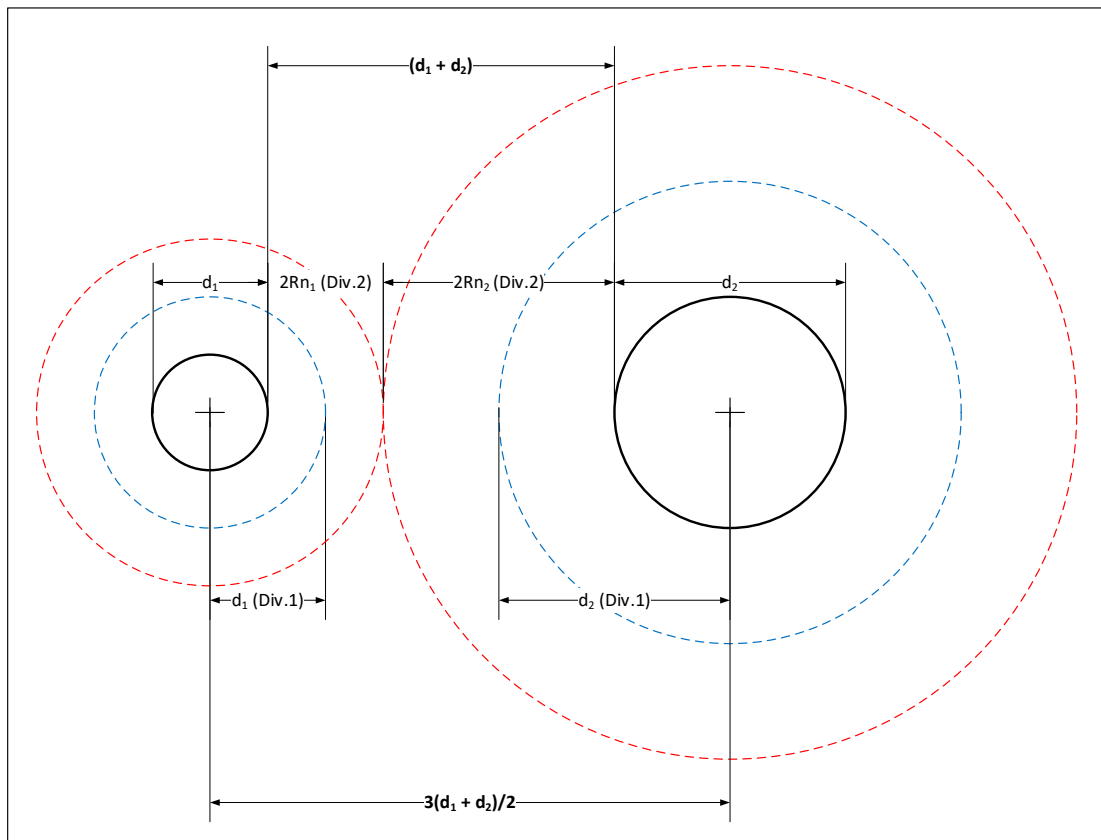
COMMITTEE	Approved	Disapproved	Abstained	Not Voting	Passed	Failed	Date

Current wording (2023)

The addition of a nozzle where reinforcement is a consideration may be considered to be a repair, provided the nozzle is identical to one in the original design, located in a similar part of the vessel, **and not closer than three times its diameter from another nozzle**. The addition of such a nozzle shall be restricted by any service requirements.

Proposed Revision:

3.3.3(j) The addition of a nozzle where reinforcement is a consideration may be considered to be a repair, provided the nozzle is identical to one in the original design (including orientation), located in a similar part of the vessel, and not spaced closer than three times the average diameter of the nozzle and any adjacent nozzle, measured from the nozzles' centerlines. The addition of such a nozzle shall be restricted by any service requirements.





## 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

<b>Item No.</b> 23-71
<b>Subject/Title</b> New method for tube replacement: is it a repair or alteration?
<b>Project Manager and Task Group</b>
<b>Source (Name/Email)</b> Robby Troutt / rob.troutt@tdlr.texas.gov
<b>Statement of Need</b> The repair/alteration method shown is used for tube replacement. This method is being done in Texas, but there is confusion on whether this method of tube replacement should be classified as a repair or an alteration.
<b>Background Information</b> This method of tube replacement allows for the use of using fillet welds to attach the collar (see attached pictures) to the tubes and header instead of requiring a full penetration weld to replace the tube. Further questions can be sent to Mr. Troutt if additional clarification is needed.
<b>Proposed Question</b> Question 1: Is the replacement of a boiler tube or tube pup using the attached design considered a repair or alteration? The attachment "Pic for interp question 1" and the 2nd page of attached "RH1 – Header Section" are for this question. Question 2: Is the installation of a replacement tube using the attached fitting considered a repair or alteration? The attachment "Pic for interp question 2" and the 1st page of attached "RH1 – Header Section" are for this question.
<b>Proposed Reply</b> Reply 1: This is a repair. Reply 2: This is a repair.
<b>Committee's Question 1</b> <u>Is the replacement of a tube or part of a tube that includes the addition of material or a change in joint design that changes the pressure retaining capability from the original design considered an alteration per NBIC Part 3, 3.4.4?</u>
<b>Committee's Reply 1</b> <u>Yes.</u>
<b>Rationale</b>
<b>Committee's Question 2</b> <del>If a tube pup or tube replacement as referenced above has been made as an alteration, and if the same tube (and ONLY the tube) is to be replaced in the future, would that be considered a repair?</del>
<b>Committee's Reply 2</b> <del>Yes.</del>
<b>Rationale</b>

**VOTE:**

COMMITTEE	Approved	Disapproved	Abstained	Not Voting	Passed	Failed	Date

## CODE INTERPRETATIONS

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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:

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.

## Abstention for I23-71

George Galanes <ggalanes@diamondtechnicalservices.com>

Wed 1/10/2024 11:15 AM

To: Terrence Hellman <THellman@nationalboard.org>

Terry

I abstained at TG Interpretations for item I23-71 because the coupling joint design must be considered as an alteration and the proposed question and reply shown were not correct.

George Galanes, P.E.

Sent from my iPad

## Abstention I23-71

Gilston Philip - Hartford-HSB <Philip\_Gilston@hsb.com>

Wed 1/10/2024 11:10 AM

To:Terrence Hellman <THellman@nationalboard.org>

Terrence,

Abstention is based on a lack of overall information to asses the question personally.

**Philip Gilston** MSc, CEng, MWeldI, IWE  
Principal Engineer, Codes and Standards

### **The Hartford Steam Boiler Inspection and Insurance Company**

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## Abstention

Seime, Trevor S. <tsseime@nd.gov>

Tue 1/9/2024 2:45 PM

To:Terrence Hellman <THellman@nationalboard.org>

Hi,

The reason for my abstention for I23-71 was I think this is not our question to answer, the decision if a job is a repair or alteration is between the Certificate Holder, Inspector, and if applicable the Jurisdiction.

### Trevor Seime

*Office of the Director • Boiler Inspection Program • Chief Boiler Inspector*

701-220-4723 • 701-328-5200 (fax) • [tsseime@nd.gov](mailto:tsseime@nd.gov) • <https://deq.nd.gov/>



## Abstentions at TG Interpretations

Triplett, Andrew <triplettal@ornl.gov>

Mon 1/8/2024 5:36 PM

To:Terrence Hellman <THellman@nationalboard.org>

Terry, I abstained from the following items today:

- I23-71 – The Committee question as worded/voted on would directly contradict at least one example of a repair in NBIC Part 3, and would also not comply with the alteration example in 3.4.4.d (which requires such dimension/contour changes to decrease an item’s pressure retaining capability, not simply change it). In addition, as I said during the discussion, while I agree that this tube replacement method would be an alteration, it should approach that conclusion from the aspect of being an encapsulation per 3.4.3, as the proposed “repair” method is functioning as a welded leak box for an unrepaired tube.
- I23-75 – The Committee question was simply a restatement of existing NBIC Part 3 language, with no additional context or transformation applied that would justify passing it. As reworded by the Committee, this Interpretation request should have been closed to no action.

Thank you.

-----  
**Andrew Triplett**  
***Boiler and Pressure Vessel Program Lead***

IOSD / QMS / S&I Welding Services  
Bldg. 7077B, Room 003, MS 6361  
DESK: 865-241-5969  
CELL: 865-272-9597

**OAK RIDGE NATIONAL LABORATORY**  
MANAGED BY UT-BATTELLE FOR THE DEPARTMENT OF ENERGY



**Action Item: 23-75**

**Date of Request: 10/17/2023**

**Requester: Andrew Triplett**

Subject of Request: NDE In Lieu of Pressure Testing for Alterations

Location 1: NBIC Part 3, Section 4, Paragraph 4.4.2.c

Location 2: NBIC Part 3, Section 9, Paragraph 9.1, definition of “Practicable”

Existing Text from Location 1: “NDE may be conducted when contamination of the pressure-retaining item by liquids is possible or when pressure testing is not practicable.”

Existing Text from Location 2: “Practicable - Capable of being accomplished based on technical consideration of the nature and scope of activities, design, or arrangement.”

Statement of Need: The existing language in NBIC Part 3, Section 4, Paragraph 4.4.2.c – in concert with the new definition of “practicable” added in the 2023 Edition of the Code – may confuse Repair Organizations and owners about their options when it comes to verifying a successful alteration to a pressure-retaining item.

Background: The definition of “practicable” added to the 2023 Edition of NBIC potentially makes the use of NDE in lieu of a pressure test unjustifiable during alterations should a pressure test be physically possible on the altered component, even if NDE would actually do a better job of verifying the alteration’s integrity.

Question 1: Does the term “practicable” as used in NBIC Part 3, Paragraph 4.4.2.c prohibit the use of NDE in lieu of pressure testing if NDE will provide sufficient information to confirm alteration integrity, given concurrence of the owner, Inspector, and Jurisdiction (as applicable)?

Proposed Reply 1: No.

Committee Question: During alteration activities, may NDE be performed in lieu of a pressure test with the concurrence of the owner, Inspector, and Jurisdiction (as applicable) even though a pressure test is practicable?

Committee Reply: No



### PROPOSED INTERPRETATION

<b>Item No.</b> 23-79
<b>Subject/Title</b> Alternative Welding Method 6 - Controlled Fill
<b>Project Manager and Task Group</b>
<b>Source (Name/Email)</b> Mark Kincaid / mark.r.kincaid@xcelenergy.com
<b>Statement of Need</b> There is a lack of clarity as to the current requirement, need, and definition of controlled fill technique for application to Welding Method 6.
<b>Background Information</b> In 2015 NBIC Part 3, 2.5.3.6 specifically mentions "controlled fill", but 2.5.3 d) calls for "temper bead" for 2.3.5.6. In 2017 NBIC Part 3, "temper bead" was changed to "controlled fill" in 2.5.3 d) for 2.5.3.6, but "controlled fill" was removed from 2.5.3.6 itself. Supplement 8, with specific controlled fill requirement for CSEF material was added in the 2017 NBIC Part 3.
<b>Proposed Question</b> Does 2.5.3 d) require controlled fill bead placement for Welding Method 6 (2.3.5.6) similar to that described in S8.3?
<b>Proposed Reply</b> No
<b>Committee's Question 1</b>
<b>Committee's Reply 1</b>
<b>Rationale</b>
<b>Committee's Question 2</b>
<b>Committee's Reply 2</b>
<b>Rationale</b>

**VOTE:**

COMMITTEE	Approved	Disapproved	Abstained	Not Voting	Passed	Failed	Date

## CODE INTERPRETATIONS

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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.

