

NATIONAL BOARD INSPECTION CODE TASK GROUP INTERPRETATIONS

MINUTES

Meeting of July 10, 2023 St. Louis, MO

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 Sieme called the meeting to order at 1:00 p.m. Central Time. For those attending in person, the meeting will be held in Cardinal C 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 guorum was reached.

4. Announcements

- The National Board will be hosting a reception on Wednesday evening from 5:30 p.m. to 7:30 p.m. at Sports & Social St. Louis Ballpark Village next to the hotel.
- The National Board will be hosting breakfast and lunch on Thursday for those attending the Main Committee meeting. Breakfast will be served from 7:00 a.m. to 8:00 a.m. in Cardinal C, and lunch will be served from 11:30 a.m. to 12:30 p.m. in Cardinal C.
- Meeting schedules, meeting room layouts, and other helpful information can be found on the National Board website under the **Inspection Code** 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) **prior to** the meeting.
 - o Note that access to the NBIC file share site is limited to committee members only.
 - o ALL power point attachments/presentations <u>must be sent to the NBIC Secretary prior to the meeting</u> for approval.
 - Contact Terry for any questions regarding NBIC file share access.
- When possible, please submit proposals in word format showing "strike through/underline".
- If you'd like to request a new Interpretation or Action item, this should be done on the National Board Business Center.
 - o 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 2 meetings prior to being put on the agenda for membership consideration. The nominee will be on the agenda for voting during their 3rd meeting.
 - The nominee must submit the formal request along with their resume to the NBIC Secretary <u>PRIOR TO</u> the meeting. <u>nbicsecretary@nbbi.org</u>
 - o 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 also is a good way to make sure we have the most up-to-date contact information.

5. Adoption of the Agenda

The agenda was updated with LB status updates and PM and TG appointments. The agenda was unanimously accepted (UA) as revised.

6. Approval of the Minutes of the January 8th, 2023 Meeting

The Minutes were motioned, seconded, and unanimously approved (UA).

7. Review of Rosters

a. Membership Nominations

- i. Mr. Andrew Triplett would like to be considered for INTERP TG membership.
- ii. Mr. Triplett was UA for INTERP TG membership.

b. Membership Reappointments

- **i.** The following Interpretations Task Group memberships are about to expire prior to the January 2024 NBIC meeting: Mr. George Galanes.
- ii. Mr. Galanes was UA to be reappointed to the INTERP TG.

8. Interpretations

New Interpretation Requests:

Item Number: I23-10 NBIC Location: Part 3, 3.3.4.6 and 3.4.3 Attachment 2

General Description: Seamless Head Flush Patch - Repair vs Alteration

Subgroup: Repairs and Alterations

Task Group: B. Boseo (PM), L. Dutra, B. Schaefer

Explanation of Need: Is the use of a flush patch on the center portion of a seamless head of an ASME Sect. VIII Div. 1 vessel considered a repair or alteration per the 2011 NBIC?

July 2023 Meeting Action: Interp TG LB Failed - Vote count was (8-2). Item was revised based on the negative comments at LB, and the revised proposal was unanimously approved (UA).

Item Number: I23-11 NBIC Location: Part 3, 5.1 and 5.11 Attachment 3

General Description: Correcting duplicate nameplate that is not affixed to directly the vessel

Subgroup: Repairs and Alterations

Task Group: M. Quisenberry (PM), R. Derby

Explanation of Need: Part 3 seems to contain no method for correcting errors on a name plate. Section 5 is not clear on what requirements apply to a duplicate name plate when the actual name plate is still affixed to the vessel and hidden under insulation. Since the duplicate name plate is not the actual name plate and is not affixed directly to the ASME pressure vessel, an R stamp holder should not be required to correct or replace a duplicate name plate. If a duplicate name plate were welded directly to the vessel, one could argue that Part 3 applies since interaction with the vessel could be required.

July 2023 Meeting Action: A letter will be sent to the inquirer that this is outside the scope of NBIC; this is an ASME CA-1 issue. NBIC Part 2, NB-136 Form may be used for replacement nameplates IAW NBIC.

Item Number: I23-15 NBIC Location: Part 3, 3.3.2 Attachment 4

General Description: Routine Repairs Using Parts With Different Nominal Composition

Subgroup: Repairs and Alterations

Task Group: T. McBee (PM), M. Schaser

Explanation of Need: As written, Paragraph 3.3.2 implies that routine repairs require repair or replacement with "like material"...as in 3.3.3 r). This is supported by Interpretation 01-19. Allowing "material upgrades"...as in 3.3.3 s)...will reduce costs and labor associated with the growing number of repairs requiring in-process inspection and stamping due solely to material availability.

July 2023 Meeting Action: Passed SG LB (11-0)

Item Number: I23-20 NBIC Location: Part 3, 3.3.4.9 Attachment 5

General Description: Boiler tube plug installation time consideration

Subgroup: Repairs and Alterations

Task Group: T.Seime (PM), D. Kinney

Explanation of Need: No specific guidance is provided within the code in regard to the length of time a boiler tube plug can be left in place. Agreement by owner, inspector, and when required, Jurisdiction is ambiguous.

July 2023 Meeting Action: Passed SG LB (21-0-2)

Item Number: I23-47 NBIC Location: Part 3, 3.4.4 d) Attachment 6

General Description: Interpretation of Alteration for dimensional change.

Subgroup: Repairs and Alterations

Task Group: None assigned.

Explanation of Need: The inquirer is looking to change a vessel nozzle flange from 150# to 300# to allow them to increase the torque value to reduce flange leaks that have been occurring.

July 2023 Meeting Action: Letter to the inquirer stating: "This is consulting."

Item Number: I23-48 NBIC Location: Part 3, 3.3.2 Attachment 7

General Description: Plugging of tube hole without welding.

Subgroup: Repairs and Alterations

Task Group: None assigned.

Explanation of Need: An Air-Cooled Heat Exchanger where the tube was expanded to the tube sheet needs to be repaired due to a tube leak. The repair will be done by plugging without removing the tube from the tube sheet. Is this considered a Routine Repair?

July 2023 Meeting Action: Letter be sent to the inquirer stating, "The NBIC Committee cannot provide an interpretation for this request, because the NBIC Part 3 does not provide rules for the plugging of heat exchanger tubes by a mechanical repair method. This is an excerpt from the Scope Statement of NBIC Part 3- "The NBIC provides rules, information, and guidance for post-construction activities, but does not provide details for all conditions involving pressure-retaining items. Where complete details are not provided in this code, the code user is advised to seek guidance from the Jurisdiction and from other technical sources."

9. Future Meetings

- January 2024 Charlotte, NC
- July 2024 TBD

10. Adjournment

Chair Seime adjourned the meeting at 1:53 PM.

Respectfully submitted,

Terrence Hellman

Terrence Hellman, TG Interpretations Secretary

INTERP TG -July 2023 ATTENDANCE

Person or Remote	First_name	Last_name	Company_name	Job_title	Email_address	Phone_number	Member or Visi
	1 Brian	Boseo	Burns & McDonnell Construction	QA Dept. Manager	bmboseo@burnsmcd.com	7089413016	M
	1 Michael	Carlson	State of Washington	Chief Boiler/Pressure Vessel Inspector	camx235@lni.wa.gov	360-902-5270	M
	Robert	Derby					M
	Jon	Ferreira	The Harford Steam Boiler Inspection and Insurance Compa	r Technical Manager	jonathan_ferreira@hsb.com	12077456889	М
	1 George	Galanes	DTS Inc.	Consultant	ggalanes@diamondtechnicalservices.com	16306825782	M
	1 Philip	Gilston	The Hartford Steam Boiler and Inspection Co.	Principal Engineer, Codes & Standards	philip_gilston@hsb.com	2253240108	M
	1 Don	Kinney					M
	1 Tim	McBee	ARISE	Manager of Codes and Standards	timothy.mcbee@tuvsud.com	12174129300	M
	1 Kathy	Moore	Joe Moore & Company		kathymoore@joemoorecompany.com	9198321665	М
	1 Michael	Quisenberry					M
	1 Matt	Schaser	The Equity Engineering Group, Inc.	Senior Engineer	mschaser@e2g.com	2165336143	M
	1 Trevor	Seime	State of North Dakota	Chief Boiler Inspector	tsseime@nd.gov	701-220-4723	М
	Marty	Toth					М
	1 Richard	Anderson	International Code Council, Inc.	Director PMG Technical Resources	randerson@iccsafe.org	9706607320	
	1 Joseph	Arvizu III	HSI Group Inc	Operations Manager	jarvizuiii@hsigroupinc.com	916-549-1342	
	1 Larry	Barr	Quality Steel Corp	Director of Engineering	lbarr@propanetank.com	4194103656	
	Robert	Black	American Boiler Manufacturers Association (ABMA)	Technical Consultant	kblackjbc@aol.com	616-405-4357	
	1 Riley	Collins	Eastman Chemical Company	Mechanical Engineer	rileycollins@eastman.com	4232295576	
	1 Eben	Creaser	Province of New Brunswick	Chief Boiler Inspector	eben.creaser@gmail.com	506-470-0645	
	Julius	Dacanay	State of Hawaii	Chief Boiler Inspector	julius.j.dacanay@hawaii.gov	8085869141	
	Caslav	Dinic	Technical Standards and Safety Authority - Ontario	Manager Technical Services	cdinic@tssa.org	16472820518	
	1 Louis	Dutra	Bay City Boiler		ldutra@baycityboiler.com	9253482881	
	Steve	Frazier	City of Seattle	Chief Boiler Inspector	steve.frazier@seattle.gov	206-684-8459	
	1 Greg	Goossens	The National Board	Director of Jurisdictional Affairs	ggoossens@nbbi.org	16513417212	
	1 Christopher	Hartford	Cincinnati Insurance Companies	Machinery & Equipment Supervisor	christopher_hartford@cinfin.com	5406826395	
	1 Terrence	Hellman	National Board	Staff	thellman@nationalboard.org	16148888320	
	Harrington	Henry	ARISE Inc.	Senior Boiler Machinery Consultant	mitsuboyee@gmail.com	6096610552	
	1 Aziz	Khssassi	Régie du bâtiment du Québec	AIA program Coordinator	aziz.khssassi@rbq.gouv.qc.ca	5142615741	
	Tusharkumar	Patel	TUV INDIA PVT LTD	Inspection engineer	tusharpatel0914@gmail.com		
	Tusharkumar	Patel	TUV NORD GROUP	Inspection engineer	ptushar@tuv-nord.com	919998907903	
	1 Luis	Ponce	National Board of Boiler and Pressure Vessel Inspectors	Manager of Technical Services	Iponce@nbbi.org	6148888320	
	Brent	Ray	Marathon Petroleum Company	Corporate Fixed Equipment Inspection Engineering Specialist	bdray@marathonpetroleum.com	(606) 471-9446	
	Keith	Sanford	State of Texas	Boiler Program Supervisor	keith.sanford@tdlr.texas.gov	832-453-3017	
	1 M. A.	SHAH	ABM Industrial Services Inc.	Donet i rogium supervisor	abmindustrialservices@gmail.com	3063515490	
	1 James	Sowinski	The Equity Engineering Group, Inc.	Principal Engineer I	jsowinski@e2g.com	2162566013	
	1 Andrew	Triplett	UT-Battelle, LLC	Boiler and Pressure Vessel Program Lead	triplettal@ornl.gov	18652415969	
	Rick	Valdez	ARB, INC	Quality Director	rvaldez@prim.com	661-331-6025	
	1 Mark	Vogt	Luminant	Principal Engineer	mark.vogt@vistracorp.com	6182103161	
	Tyler	Ward	Central Maintenance and Welding	i i incipui Engineei	tward@cmw.cc	8638388442	
	David	Zalusky	CNA Insurance	EB Risk Control Consulting Director	david.zalusky@cna.com	410-841-9781	
	1 Pat	Becker	or or mountained	ES MAN COMMON CONSUMING DIRECTOR	da ria zarasky @ cria.com	710 071 3781	
	1 Stacey	Marks					
	1 Paul	Shanks					
	1 Robert	McGuire					
	1 Melissa	Wadkinson					
	1 Robert						
		Underwood					
	1 Joeseph	Morgan					
	1 Brian	Morelock					
	1 Timothy	Memmer					

TEAMS MEETING SUMMARY:

1. Summary

 Meeting title
 INTERPRETATION TG

 Attended participants
 1

 Start time
 7/10/23, 1:32:32 PM

 End time
 7/10/23, 2:54:26 PM

 Meeting duration
 1h 21m 53s

51m 19s

2. Participants

Average attendance time

First Join In-Meeting Duration Email Participant ID (UPN) Role Name Last Leave Terrence Hellman 7/10/23, 1:46:47 PM 7/10/23, 2:54:13 PM 1h 7m 26s THellman@nationalboard.org thellman@nationalboard.org Organizer Paul SHANKS 7/10/23, 1:55:28 PM 7/10/23, 2:54:15 PM 58m 47s Paul.Shanks@bureauveritas.com Paul.Shanks@bureauveritas.com Presenter

Attachment 1 - INTERP TG - Attendance - July 2023 - Page 2 of 2

Stacey MARKS	7/10/23, 1:55:28 PM	7/10/23, 2:54:00 PM	58m 31s
Mcguire, Robert (GE Vernova)	7/10/23, 1:56:20 PM	7/10/23, 2:54:16 PM	57m 55s
Collins, Riley M	7/10/23, 1:59:13 PM	7/10/23, 2:54:07 PM	54m 54s
Morelock, Brian R	7/10/23, 2:00:29 PM	7/10/23, 2:30:11 PM	29m 41s
Joseph Arvizu III	7/10/23, 2:00:57 PM	7/10/23, 2:54:25 PM	53m 28s
Timothy Memmer	7/10/23, 2:02:53 PM	7/10/23, 2:54:18 PM	51m 24s
Hartford, Christopher	7/10/23, 2:04:43 PM	7/10/23, 2:54:15 PM	49m 31s
Morgan, Joseph (JE)	7/10/23, 2:11:39 PM	7/10/23, 2:54:07 PM	42m 28s
M. A. Shah	7/10/23, 2:14:05 PM	7/10/23, 2:54:26 PM	40m 21s
3. In-Meeting Activities			
Name	Join Time	Leave Time	Duration
Terrence Hellman	7/10/23, 1:46:47 PM	7/10/23, 2:54:13 PM	1h 7m 26s
Paul SHANKS	7/10/23, 1:55:28 PM	7/10/23, 2:54:15 PM	58m 47s
Stacey MARKS	7/10/23, 1:55:28 PM	7/10/23, 2:54:00 PM	58m 31s
Mcguire, Robert (GE Vernova)	7/10/23, 1:56:20 PM	7/10/23, 2:54:16 PM	57m 55s
Collins, Riley M	7/10/23, 1:59:13 PM	7/10/23, 2:54:07 PM	54m 54s
Morelock, Brian R	7/10/23, 2:00:29 PM	7/10/23, 2:30:11 PM	29m 41s
Joseph Arvizu III	7/10/23, 2:00:57 PM	7/10/23, 2:54:25 PM	53m 28s
Timothy Memmer	7/10/23, 2:02:53 PM	7/10/23, 2:54:18 PM	51m 24s
Hartford, Christopher	7/10/23, 2:04:43 PM	7/10/23, 2:54:15 PM	49m 31s
Morgan, Joseph (JE)	7/10/23, 2:11:39 PM	7/10/23, 2:54:07 PM	42m 28s
M. A. Shah	7/10/23, 2:14:05 PM	7/10/23, 2:54:26 PM	40m 21s
IVI. A. SIIGII	7/10/25/2:11:05 110	7/10/23, 2.34.2011	40111 2 1 3

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jemorgan1@dow.com	U654081@DOW.COM	Presenter
		Presenter

Email	Role
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robert.b.mcguire@ge.com	Presente
rileycollins@eastman.com	Presente
morelock@eastman.com	Presente
jarvizuiii@hsigroupinc.com	Presente
tmemmer@propanetank.com	Presente
Christopher_Hartford@cinfin.com	Presente
jemorgan1@dow.com	Presente
	Presente



Item No.
23-10
Subject/Title
Seamless Head Flush Patch - Repair vs Alteration
Project Manager and Task Group
Source (Name/Email)
Terrence Hellman / thellman@nationalboard.org
Statement of Need
Is the use of a flush patch on the center portion of a seamless head of an ASME Sect. VIII Div. 1 vessel considered a repair or alteration per the 2011 NBIC?
Background Information
A seamless bottom head of a vertical ASME Sect. VIII Div. 1 vessel is corroded and needs to be repaired per the 2011 NBIC. The "R" Certificate Holder will use a full penetration flush patch to replace the center corroded area of the head (in lieu of replacing the entire head). As a result of the flush patch, there is now a weld seam in a previously "seamless" head. Since welding will be performed on the head, the required thickness may be affected because the possible reduction in joint efficiency due to the new seam on the patch, and the strength and composition of the weld metal. Consequently, the repair organization has the responsibility to consider all design aspects. Per the 2011 NBIC, 3.4.3, Examples of Alterations: h) Replacement of a pressure-retaining part in a pressure-retaining item with a material of different allowable stress or nominal composition from that used in the original design;
Proposed Question
Question 1 When replacing any part of a seamless head with a full penetration flush patch, is the repair organization responsible for any changes in design? Question 2 Is the use of a flush patch on a seamless head an Alteration?
Proposed Reply
Reply 1 Yes. Reply 2 Yes.
Committee's Question 1 When installing a flush patch in an ASME Section VIII Div. 1 pressure vessel seamless head, is the repair organization responsible for evaluating any changes in design and examination requirements to determine if it is a repair or alteration?
Committee's Reply 1
Yes
Rationale
Rationale



Item No.
23-11
Subject/Title
Correcting duplicate nameplate that is not affixed to directly the vessel
Project Manager and Task Group
Source (Name/Email)
Adam Renaldo / adam_renaldo@praxair.com
Statement of Need
Part 3 seems to contain no method for correcting errors on a name plate. Section 5 is not clear on what requirements apply to a duplicate name plate when the actual name plate is still affixed to the vessel and hidden under insulation. Since the duplicate name plate is not the actual name plate, and is not affixed directly to the ASME pressure vessel, an R stamp holder should not be required to correct or replace a duplicate name plate. If a duplicate name plate were welded directly to the vessel, one could argue that Part 3 applies since interaction with the vessel could be required.
Background Information
During inspection, a vessel was found with a duplicate ASME name plate that incorrectly indicated the MDMT. A check of the U-1A form, and communication with the manufacturer, confirmed that the duplicate name plate had a typo that requires correction. The actual ASME name plate is welded directly to the vessel and hidden under insulation. The duplicate is welded to a support leg.
Proposed Question
(1) Does the correction or replacement of a duplicate ASME name plate with a typographical error fall under the scope per Section 5.1 when the duplicate name plate is not affixed directly to the pressure vessel? (2) Does the NBIC contain any procedures for correcting a typographical error on a duplicate ASME nameplate that is affixed to a structural support or non-pressure-retaining part of the ASME pressure vessel? (3) Do the requirements of Section 5.11 apply to the correction or replacement of an inaccurate duplicate ASME nameplate that is affixed to a structural support or non-pressure-retaining part of the ASME pressure vessel? (4) Do the requirements of Section 5.11 apply to the correction or replacement of an inaccurate ASME name plate or duplicate name plate that is affixed directly to the pressure vessel?
Proposed Reply
(1) No (2) No. If a duplicate name plate is not affixed directly to the pressure vessel, corrections of typographical errors on the duplicate name plate fall outside the scope of Part 3 and are left to the discretion of the owner working in conjunction with the manufacturer. (3) No (4) Yes
Committee's Question 1
Committee's Reply 1
Rationale
Committee's Question 2
Committee's Reply 2



Item No.
23-15
Subject/Title
Routine Repairs
Project Manager and Task Group
Source (Name/Email)
Mark Kincs / mark.r.kincs@xcelenergy.com
Statement of Need
As written, Paragraph 3.3.2 implies that routine repairs require repair or replacement with "like material"as in 3.3.3 r). This is supported by Interpretation 01-19. Allowing "material upgrades"as in 3.3.3 s)will reduce costs and labor associated with the growing number of repairs requiring in-process inspection and stamping due solely to material availability.
Background Information
Oftentimes, original materials of construction are no longer available or cost-prohibitive to obtain. Replacement of pressure-retaining components with those of different nominal composition is commonplace. The required in-process Inspector involvement and stamping of these common repairs is believed unnecessary.
Proposed Question
May repair or replacement of tubes, pipes, butt-welded fittings, or nonload bearing attachments with a code-acceptable material having a nominal composition and strength equivalent to or greater than the original material with equal-or-greater material thickness, that is suitable for the intended service, be considered a routine repair if the requirements of NBIC Part 3, 3.3.2 and the categories of 3.3.2 e) are met?
Proposed Reply
Yes, with concurrence of the Inspector and Jurisdiction, as applicable.
Committee's Question 1 1: May the replacement or repair of a pressure-retaining item using code-acceptable material suitable for the intended service, that has a different nominal composition, strength and thickness equivalent to or greater than the original material, be considered a routine repair if it meets the requirements of NBIC Part 3, 3.3.2 and one or more of the categories listed in 3.3.2 e)?
Committee's Reply 1
1: Yes
Rationale
2021 NBIC Part 3, 3.3.3, r) and 3.3.3, s), Interpretation 21-08.
Committee's Question 2
Committee's Reply 2
Rationale



Item No.
23-20
Subject/Title
Boiler tube plug installation time consideration
Project Manager and Task Group
Source (Name/Email)
David Starr / dave.starr@starrcompanies.com
Statement of Need
No specific guidance is provided within the code in regard to the length of time a boiler tube plug can be left in place. Agreement by owner, inspector, and when required, Jurisdiction is ambiguous.
Background Information
Currently owners, inspectors, repair companies and Jurisdictions are applying this rule inconsistently. Often boiler tube (s) remain plugged for the life of the boiler and in some Jurisdictions this is an acceptable practice. In other cases plugged boiler tubes are required to be removed as soon as possible. Currently inconsistency in the industry is causing confusion.
Proposed Question
May a boiler be returned to service permanently with plugged tubes if agreed upon by the owner, the inspector, and when required, the Jurisdiction?
Proposed Reply
No, a plugged tube or tubes is not considered a permanent repair.
Committee's Question 1
Does the NBIC specify the time period a boiler may be placed back in service after firetubes are plugged per NBIC Part 3, 3.3.4.9?
Committee's Reply 1
No.
Rationale
Committee's Question 2
Committee's Reply 2
Rationale



Item No.
23-47
Subject/Title
Interpretation of Alteration for dimensional change.
Project Manager and Task Group
Source (Name/Email)
Corey Mccon / cmccon@cfindustries.com
Statement of Need
Just need some clarification as we have gotten conflicting responses from different parties.
Background Information
We are looking to change a vessel nozzle flange from 150# to 300# to allow us to increase the torque value to reduce flange leaks that have been occurring.
Proposed Question
Section 3.4.4 d) states an example of an alteration is a change in the dimensions or contour of a pressure retaining item. Would this include a change a flange OD? For example if you are changing a nozzle flange from a 150# flange to a 300# flange would that fall under this section due to the added flange thickness and OD, even though the ID is remaining the same.
Proposed Reply
Yes.
Committee's Question 1
Committee's Reply 1
Rationale
Committee's Question 2
Committee's Reply 2
Rationale



Item No.
23-48
Subject/Title
Plugging of tube hole without welding.
Project Manager and Task Group
Source (Name/Email)
Djoni Pratomo / djoni_pratomo@yahoo.com
Statement of Need
Paragraph 3.3.3.f of NBIC Part 3 describes only when welding is involved.
Background Information
This question is different from Interpretation No 21-17, Question No 2, where the tube was removed and can not be considered as Routine Repair.
Proposed Question
An Air Cooled Heat Exchanger where the tube was expanded to the tube sheet needs to be repaired due to a tube leak. The repair will be done by plugging without removing the tube from the tube sheet. Is this considered as Routine Repair?
Proposed Reply
Yes.
Committee's Question 1
Committee's Reply 1
Rationale
Committee's Question 2
Committee's Reply 2
Rationale