

COMMENTS BY ROBERT J. MASTERSON, ANVIL INTERNATIONAL, INC.
ON DRAFT REGULATORY GUIDE DG-1169
SERVICE LIMITS AND LOADING COMBINATIONS FOR CLASS 1 PLATE-AND-SHELL-TYPE COMPONENT SUPPORTS

COMMENT 1: General Comment.

Throughout the Draft Regulatory Guide, Plate-And-Shell-type supports are referred to as "Component Supports". This is an incorrect designation, since the term "Component Supports" was changed to "Supports" with the issuance of the Winter 1982 Addenda to the 1980 Edition of Subsection NF. In that Addenda Article NF-3000 was revised in its entirety to introduce the concept of "Piping Supports". Previously, the term "Component Supports" encompassed the entire family of supports, i.e. supports on components such as tanks, vessels, pumps, etc. and supports on piping, thus the title of Subsection NF originally (1974) was "Component Supports".

With the Winter 1982 Addenda rewrite, "Component Supports" no longer meant the family of supports, but meant only supports attached to components such as tanks, vessels, pumps, etc. (NF-3500). Also at this time, supports attached to piping were referred to as "Piping Supports" (NF-3600). Over the next few years, the generic term "Component Supports" was changed to "Component and Piping Supports" throughout Subsection NF and the title on the cover of Subsection NF was changed from "Component Supports" to "Supports" (1995 Edition).

If the Draft Regulatory Guide is only supposed to apply to supports attached to components and not to supports attached to piping, then it is correct as written. If the Draft Regulatory Guide is meant to apply to all Plate-And-Shell-type supports, i.e. component and piping supports, then the term "Component Supports" needs to be changed to "Supports" or "Component and Piping Supports".

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J. Yerokun (JTY)