

Boiler and Pressure Vessel Inspectors

1979-80 Director

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EXECUTIVE COMMITTEE

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March 30, 1979

NOTES OF MEETING WITH AUTHORIZED INSPECTION AGENCIES AND THE NATIONAL BOARD

March 22, 1979
Hospitality Inn
Columbus, Ohio

PRESENT:

Authorized Inspection Agencies (Insurance Companies):

Cincinnati Insurance Company

F. Love
E. L. Smith

Continental Insurance Companies

D. P. Fairman
L. E. Hiller
S. J. Kropilak
P. Lee
D. N. McDaniel
D. Cline
O. G. Williams

Commercial Union Assurance Companies

T. Bennett
T. B. Henehan
R. S. Miller

Employers Casualty Company

E. M. Smith

Factory Mutual System

S. M. Sullivan
E. W. Resell
V. Bona
A. J. Spencer
J. W. Woodward

Hartford Steam Boiler Inspection and Insurance Company

C. Pickett
D. R. Young

Home Insurance Company

D. Q. Sayer

Kemper Insurance Companies

R. E. Muise
J. E. Ayotte

Lloyds Register Industrial Services (Insurance) Inc.

V. W. Bugg

Maryland Casualty Company

T. R. Kaye

Royal Globe Insurance Companies

B. Gwilliam

The Travelers

C. K. Holley

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Authorized Inspection Agencies (Insurance Companies) (con't.):

Western National Mutual Insurance Co.

A. Toltzman

Zurich-American Insurance Co.

M. J. Scott
John Stephens

Authorized Inspection Agencies (Jurisdictions):

R. E. Jagger, State of Ohio

C. A. Brown, Commonwealth of Kentucky

A. Sherwood, State of New Jersey

U. S. Nuclear Regulatory Commission:

W. Reinmuth
C. J. Hale
J. G. Spraul

National Board Staff:

S. F. Harrison
W. L. Garvin
D. J. McDonald
R. Beckwith
W. F. Johnson
C. Rizzuti

1. OPENING REMARKS - S. F. HARRISON

S. F. Harrison opened the meeting at 9:00 A.M. and expressed his appreciation for the large attendance which indicated the cooperative attitude of the Authorized Inspection Agencies in reviewing some of the problems encountered with ASME/National Board stamped boilers and pressure vessels.

He stated that in the past year it has been necessary for the National Board to make investigations of several ASME Code shops as a result of reports to the National Board of apparent Code violations.

He stated that an overall review of the investigations had indicated that there had been a breakdown in the implementation of the manufacturer's written Quality Control System. He emphasized that the Authorized Inspectors must advise the manufacturer that his Q. C. Manual must be used and strictly followed.

He also stated that in some instances, the Supervisor responsible for the activities of the Authorized Inspector did not appear to be making a sufficient number of visits to the Code shops. He cited one case where an Authorized Inspector Supervisor was responsible for the activities of the Authorized Inspectors making inservice inspections at 80 or 90 shops, which indicated the Supervisor appeared to be assigned too many shops. He questioned whether or not this was a result of lack of support of the Authorized Inspection Agency for ASME Code shop inspection activities.

The results of all investigations in the past twelve months involving apparent Code violations regarded welding; apparently there was not sufficient attention paid to the requirements of Section IX, the applicable Book Section of the Code regarding welding procedure specifications and the qualification of the procedures and operators.

He stated that in recent months, we have noted an improvement in the quality of authorized shop inspection in ASME Code shops citing that we found diaries were, in general, kept by the Authorized Inspectors, the Inspectors were becoming better trained and more experienced, the manufacturer's Quality Control Manuals were improving, the Authorized Inspectors appeared to be requesting the assistance of their Supervisors more frequently and, in general, the Authorized Inspection Agencies' administration and communications with the Authorized Inspectors were improving.

2. COMPLETION OF MANUFACTURERS DATA REPORTS - D. J. MCDONALD

D. J. McDonald opened by stating that the National Board at present has on permanent file approximately 13 million ASME manufacturer's data reports which had been registered with the National Board. He indicated that due to the high volume of data reports which were processed each day by the National Board, it was essential that they be properly completed and contain factual information.

He then proceeded to outline some of the common problems which were encountered with respect to the completion of the data reports.

He indicated that the Code manufacturer's Quality Control System should specifically assign the responsibility of the preparation of the data reports to a responsible person in the company. This was usually assigned to either the Engineering or Quality Control Department. He emphasized that when the manufacturer signs an ASME data report, he verifies that the construction of the object meets the requirements of the ASME Boiler and Pressure Vessel Code and that when the Authorized Inspector signs it, he verifies that to the best of his knowledge and ability, the object meets Code and that he had carried out the necessary inspections.

D. J. McDonald showed examples of data reports which had been received by the National Board which had not been signed by either or both, the manufacturer's representative or the Authorized Inspector. This, he stated, indicated a lack on both the part of the manufacturer and the Authorized Inspector since it was their responsibility and duty to ensure that the data report was properly completed before distribution.

He also stated that in some instances, the correct name as it appeared on the ASME Certificate of Authorization did not appear on the data reports.

It was pointed out that further deficiencies in the data reports which the National Board frequently encountered were as follows:

1. No indication of location of installation
2. No indication of year built
3. The National Board Number was not entered in the proper space.
4. The material specification was not indicated for nozzles and other attachments.
5. Technical information had been changed without the change being initialed by the Authorized Inspector.
6. Data reports not legible
7. Data reports not on the required size of 8½ x 11
8. Transparencies used for data report forms

D. J. McDonald emphasized that the only time the Authorized Inspector may indicate his National Board Commission Number in the appropriate space is when the manufacturer's data report (or partial data report) was to be registered with the National Board and had been assigned a National Board Number.

He stated that when the object was not to be registered with the National Board, the Authorized Inspector should indicate his jurisdictional Certificate of Competency Number in the space and not show his National Board Commission Number.

He stated that technical changes to the manufacturer's data report must be initialed by the Authorized Inspector, however, changes which were of a non-technical nature may be made by the manufacturer provided such changes were either typewritten or indicated in a legible manner.

3. RECENT NATIONAL BOARD INVESTIGATIONS - W. L. GARVIN

W. L. Garvin stated that as a result of written complaints of apparent ASME Code violations received by the National Board, it had been necessary to conduct six investigations within the past twelve months.

He stated that as a result of these investigations, in all cases the manufacturer involved had had his authorization to use the ASME Code Symbol Stamp withdrawn and that National Board Hearing Committees had, or were scheduled to be held, to assess the implication of the Authorized Inspectors and their Supervisors in the ASME Code shops that were investigated.

He reported that as a result of the Hearing Committees which had been held, all the Authorized Inspectors had been placed on probation for a one-year period, two Supervisors had been placed on probation for one year, and one Inspector had his National Board Commission suspended in accordance with the findings of the Hearing Committees.

In reply to a question regarding deficient boilers and pressure vessels which may have been installed in the field, W. Garvin replied that it is the practice of ASME to stipulate that the manufacturer involved make a commitment that they will bring into compliance, replace or remove the ASME/National Board stamping on any boilers or pressure vessels which they have shipped and which are found to be defective.

He outlined the procedure under these circumstances whereby the National Board notifies the Chief Inspectors of the jurisdictions in which the suspect boilers or pressure vessels have been installed at which time a request is made of the jurisdictions to make an inspection of the objects. If non-Code construction is observed by the Chief Inspectors, steps are then taken to have the manufacturer rectify these violations.

W. Garvin then outlined some of the Code violations found as a result of the National Board investigations. These were as follows:

1. (a) Incomplete and inadequate welding procedure specifications
(b) Incomplete or lack of welding procedure qualifications
(c) Incomplete or lack of operators or welders qualifications
2. Improper welding which included excessive undercuts, valleys, ridges, excessive reinforcement, weld wire imbedded in weld, cracks in the welds, tack welds not removed nor prepared prior to final welding.
3. Lack of penetration and fusion

He stated that in all cases where improper welding had been carried out, it had been verified that the manufacturer's Quality Control System was not being followed and this deficiency should have been observed and corrective action taken by the Authorized Inspector.

4. The investigations also revealed that several vessels had
 - (a) Improper fit-up
 - (b) Excessive roundness

- (c) Excessive fit-up tolerances
- (d) Heads improperly formed
- (e) Nozzles installed which were of the wrong type schedule
- (f) Reinforcing pads missing on nozzles
- (g) No manhole (Code required)

W. Garvin stated that these deficiencies also indicated a breakdown in the manufacturer's Quality Control System which should have been brought to the attention of the manufacturer and corrective action taken.

He pointed out that in some shops the manufacturer's written Quality Control System was inadequate and emphasized that since the Authorized Inspection Agency representatives have equal representation on all ASME review teams, any inadequacies of the manufacturer's Q.C. System should be corrected at that time. He indicated that a proper Quality Control System was the Inspector's most useful tool to ensure that Code compliance is obtained since the requirements in the Quality Control Manual were considered to be ASME Code requirements after it had been accepted by representatives of the Society.

He stated that it was obvious at the ASME Code shops which had been investigated by the National Board that the manufacturer's Quality Control System was either or both inadequate and not being followed by the manufacturer. This situation seemed to invariably lead to boilers or pressure vessels which do not meet the ASME Code requirements.

4. ASME MANUFACTURERS DATA REPORTS FOR OBJECTS INSTALLED IN THE STATE OF OHIO - R. E. JAGGER

R. E. Jagger, in reply to a question, clarified the requirement for the Authorized Inspector's signature on ASME data reports for boilers and pressure vessels to be installed in the State of Ohio. He stated that provided the boiler or pressure vessel was registered with the National Board, it was only necessary for the Authorized Inspector to indicate his National Board Commission Number on the data report and it was not necessary for him to indicate his State of Ohio Commission Number.

If, however, the boiler or pressure vessel was not registered with the National Board, the Inspector was to insert "Ohio Commissioned" in the appropriate space on the data report. He emphasized that the Inspector must possess an Ohio Commission before he may sign the manufacturer's data reports for vessels which were to be installed in Ohio.

R. E. Jagger further advised that attempts were being made to have the Ohio Law revised to eliminate the necessity for the reciprocal Ohio Commission requirement for vessels to be installed in that state.

5. ASME CODE FIELD WORK - R. BECKWITH

R. Beckwith outlined many of the apparent Code violations which had been uncovered as a result of investigations of field erected Section I fossil fuel utility boilers.

He first outlined the requirements of Section I for field erection as follows:

1. Although Section I requires that the Authorized Inspector monitor the Quality Control Program in the field, the investigations revealed that a considerable amount of ASME Code work was being performed at field sites with no inspections made by the Authorized Inspector.
2. In some instances, the assembler will call for the services of the Authorized Inspector when the boiler is ready for a hydrostatic test and that this will have been the first time that the Authorized Inspection Agency has known that Code work is being performed and the boiler being installed.
3. In some instances, it was found that during the assembly of a large utility boiler, a very minimal number of visits by the Authorized Inspector was made.

He pointed out that it was the mutual responsibility of the boiler manufacturer or assembler and duty of the Authorized Inspector to ensure that the terms and conditions of furnishing inspection services are clearly defined. Contrary to this provision, it was frequently found that inspection service is provided by means of a purchase order and as a result, the Authorized Inspector only visits the site when requested to do so by the boiler manufacturer or assembler. He stated that does not give the Inspector freedom to visit the site when he desires and to perform the necessary inspections as required by the ASME Code. It also places the Authorized Inspector in a subservient position relative to the manufacturer or assembler.

R. Beckwith stated that none of these situations is in accordance with the provisions of Section I of the Code where it is the duty of the Authorized Inspection Agency and the responsibility of the ASME Code Stamp Holder to ensure that the ALA is appraised of new jobs to be started and provide the required inspection at the job site.

With respect to written Quality Control Systems, R. Beckwith stated that it is common to find that the Quality Control Manual at the site is a company corporate manual without amendments applicable to the specific site. In cases such as this, Code activities which are performed are not covered under the manual for field sites and some are in conflict with the corporate Q. C. Program.

Usually, general engineering and purchasing for a large utility boiler is performed at a corporate level and welding materials are purchased at the field site. It had been found that this procedure violated the provisions of the corporate Q. C. Manual. A manual applicable to the specific field site must be prepared to cover this situation.

R. Beckwith further stated that on field sites it was common to find complete:

- (a) Lack of control of welding material
- (b) Non-identifiable welding material was being used
- (c) Adequate facilities for storing welding material were not available
- (d) No control over the issuance of welding material
- (e) No record of distribution or return of welding material

In addition, holding ovens were found to be either non-existent or completely inadequate.

He pointed out that if the Quality Control Program was properly written and monitored by the Authorized Inspector, and provided he was on the site frequently enough to monitor this program, these Q. C. System deviations should not occur.

R. Beckwith stated that it was common to find inadequate welding procedure specifications and procedure qualification records and there was an abuse of the use of WPS's which had been prepared and qualified by one company and being used by another.

He also stated that although the Code requires that the welding procedure specifications be available to the welder and the Authorized Inspector for reference, in many instances this provision was being violated in the field.

The situation indicated that there was a lack of involvement and review by the Authorized Inspector regarding welding procedures.

Although most Q. C. Manuals had a requirement for an examination and inspection program and that a form of traveler or inspection checklist was required, it was found that no such inspection record was in use at some field sites. Under conditions such as this, there is an inadequate procedure which would permit the Authorized Inspector to determine at what specific stages of inspections he wished to have performed.

With respect to NDE, R. Beckwith pointed out that at field sites, in general, he found that the requirement for records of the certified NDE Examiners were not available as required by the Code. When the NDE work is subcontracted and their examiners qualified to SNT-TC-1A, it was found that records of verification of this requirement were lacking. When situations

such as this occur, the validity of the evaluation of the radiographs is in question.

R. Beckwith reviewed two cases where the National Board reviewed the functions of field sites and found more than 75% of the work was completed and neither the welding procedures nor the NDE certification were acceptable. In these instances, he questioned how the Authorized Inspector could sign the data report for the completed boiler when there was no documentation that the Code requirements in this respect had been followed. This would place the National Board Commissions held by the Authorized Inspector and the Supervisor in jeopardy.

Diaries covering the activities of the Authorized Inspector at field sites were found inadequate and did not truly reflect the inspections which he had performed. He stated that the same was true of the Authorized Inspector Supervisor's record of audits.

The National Board representatives had found situations where it was questionable as to the supervisory function of the Authorized Inspector Supervisor who had been assigned to monitor the activities of Authorized Inspectors at field sites since the Supervisor did not appear to have direct supervisory responsibility over the Authorized Inspector.

R. Beckwith summed up the conditions of the investigations which the National Board had made of the erection of large utility boilers by saying that, in general, ASME Code requirements had not been followed specifically in the areas of welding and NDE personnel qualification requirements, and that there had been definite inadequacies of Authorized Inspector involvement with respect to frequency of visits to the site and specific inspection functions. He stated that this could be the result of contractual agreements between the boiler manufacturer or erector on the site and also an inadequate Quality Control System which was specifically written to comply with Code requirements at the site.

6. QUALITY SYSTEMS, NATIONAL BOARD COMMISSION REQUIREMENTS, NRC DEVIATIONS -
W. F. JOHNSON

W. F. Johnson stated that since the written Quality Control System requirements for ASME boiler and pressure vessel fabrication became mandatory in July, 1973, most manufacturers had had their Quality Control Systems and implementation of their systems reviewed twice. He stated that as a result, the written Quality Control Programs were more comprehensive and completed and he emphasized that the Authorized Inspector should rely on a good Quality Control System for monitoring purposes to ensure ASME Code requirements were being met.

He also stated that the Authorized Inspector must demand that the Quality Control System be followed and if this is not being done despite his efforts, he should write his Supervisor providing complete details of the situation and provide the manufacturer with a copy of his report to the Supervisor. He stated that it is essential that all complaints of this nature be documented.

A suggestion was made that another effective way to correct a situation where the manufacturer is not following his Quality Control System would be for the Inspector to write the Plant Manager outlining the problems.

W. Johnson stated that in the past twelve months it had been necessary, in 29 instances, for the review team not to recommend that the manufacturer's ASME Certificate of Authorization be renewed. He stated that on these renewals, the manufacturer was supposed to have a written Quality Control System which met Code requirements and the Authorized Inspector should ensure that the Q.C. Manual is updated to meet these requirements. He also stated that in fifteen plants, renewal was on a conditional basis where the Authorized Inspector was required to follow up that certain deficiencies were corrected. In some cases, it was necessary to conduct a re-review under these "conditional" circumstances.

W. Johnson stated that the primary reason for the failure for the 29 companies to have their Certificates renewed was that the Quality Control Manual was not being implemented. He stated that the Authorized Inspector must be completely familiar with all requirements of the Quality Control Manual and ensure that provisions of the manual are followed. He also stated that in most cases, an Authorized Inspector Supervisor had not audited the Inspector in the shop and that, in all probability, if an audit had been made the failures would not have occurred.

The Inspector must monitor the Quality Control System on a continuing basis and not just witness hold points and carry out other specific functions as required by the Code.

He suggested that at the time the ASME notifies the manufacturer, six months prior to when his Certificate is to expire, that they offer assistance to the company to ensure that the review for the renewal of the Certificate will be favorable.

With respect to Para. UG-90(c)(2) of Section VIII, Division 1 of the ASME Code, W. Johnson stated that this provision was not intended to cut down on inspection services and that an Authorized Inspector must be in the manufacturer's shop at all times that ASME Code work is being carried out. He also pointed out that Section VIII, Division 1 required that if any changes to the written Quality Control System of a manufacturer under the provisions of UG-90(c)(2) must be submitted for acceptance to the Authorized Inspection Agency, the Jurisdiction (if that jurisdiction participated in the shop review), and finally, the National Board, and that it was the responsibility of the Authorized Inspection Agency to coordinate the submission of revisions to the Q.C. System by forwarding such revisions to the responsible organizations.

W. Johnson cited some instances regarding frequency of shop inspection by the Authorized Inspector. He stated that in one case a manufacturer who fabricated 6,000 ASME stamped objects in a year, the Authorized Inspector was in the shop only three days per week. He stated that in his opinion, this

inspection frequency appeared to be completely inadequate and in cases such as this, the National Board would question the Authorized Inspection Agency responsible for the inspection services if they considered this to be sufficient inspection and request them to evaluate this situation.

He also stated that in some instances, the National Board had received complaints that the services of the Authorized Inspector were not available when the manufacturer had requested them. He pointed out that this internal problem should be resolved between the Authorized Inspection Agency and the manufacturer.

Regarding joint reviews for the issuance of renewal of ASME Certificates of Authorization, he stated that in some cases, the Authorized Inspector was not available and not present during the review. Although it was not mandatory that the Authorized Inspector assigned to the shop be present, he strongly recommended that the Authorized Inspector participate in the reviews since he was most familiar with the operations of the manufacturer and that it was for the benefit of all concerned that he actively participate in the work of the review team. W. Johnson added that in more than one instance where the Authorized Inspector assigned to the shop was not present during the review, his Supervisor had been present but it was his first visit to the manufacturer's shop. He stated that this did not appear to be fair to the manufacturer and that it was very difficult under these circumstances to make a comprehensive review of the manufacturer's plant.

In answer to a question, W. Johnson stated that on a review of a manufacturer's plant for the initial issuance of an ASME Certificate of Authorization, the Authorized Inspector should definitely be present since he would be involved in the implementation of the Quality Control (Manual) System.

With regard to ASME resurveys for renewal of Section III Certificates of Authorization, he stated that on an average, there had been one failure per month over the past year and that an average of two Certificates of Authorization had been renewed on a conditional basis where follow-up action had been required by the Authorized Inspection Agency before the renewed Certificate would be issued.

With respect to reports of audits by the Nuclear Regulatory Commission, W. Johnson stated that an example of five such reports indicated 28 Code discrepancies. He pointed out that many of the items listed as being deficient on the NRC audit reports did not involve ASME Code requirements.

The areas most frequently found deficient on Section III surveys appeared to be proper qualification of welding procedure specifications and welders, problems meeting the requirements of SNT-TC-1A, and the requirement that manufacturers indoctrinate and train personnel involved in the Quality Assurance Program of their shop. In addition, he stated that in some instances there was a lack of follow-up of the audits of the Quality Assurance System which had been carried out by the manufacturer.

W. Johnson further stated that it was the responsibility of the Authorized Inspection Agency to carry out annual audits of manufacturers who hold ASME Interim Letters of Authorization (Section III) at least once each year and this audit must include the work that may be in progress.

W. Johnson outlined the importance of applicants for a National Board Commission indicating accurate and true experience which is required by the National Board By-Laws. He cited instances of applicants claiming credit for college degrees other than those in engineering. He indicated that several applications are received from persons who do not have proper experience and that the experience which is listed is incorrectly indicated.

He stated that on several applications, it was necessary to obtain letters from former employers of the applicant to verify and elucidate on their experience. In some cases when this information was received, the type of experience could not be accepted as experience required by the National Board By-Laws.

In reply to a question, W. Johnson stated that Nondestructive Examination experience was not considered applicable for persons who wish to obtain a National Board Commission and that experience in a Quality Control Department of a manufacturer may not be acceptable as a credit towards experience leading to a National Board Commission.

7. COMMENTS OF W. REINMUTH, U. S. NUCLEAR REGULATORY COMMISSION

W. Reinmuth stated that he was encouraged by the meeting since the problems of authorized inspection as required by the ASME Code appeared to be being faced squarely by those involved.

W. Reinmuth referred to a pending letter of agreement between ASME, National Board and NRC whereby the NRC would endorse the ASME/National Board system of fabrication and inspection of Section III components and thereby help to eliminate redundant inspections and audits of various organizations responsible for this function.

W. Reinmuth stated that before the "third-party trial program" could be accepted by NRC, many changes had been made or would be required to be made in the future. He outlined some of these as follows.

He pointed out that several Code changes had been made and also that a Subcommittee on Nuclear Certification had been established, in addition to the utilities' participation on ASME surveys of Section III manufacturers.

He pointed out that with respect to Quality Assurance standards, NRC required the same provisions of 10CFR50 Appendix B and the ANSI N45.2 Series to be implemented. He stated that the ASME Boiler and Pressure Vessel Committee had been working on a "NQA Proposal" which possibly could answer this problem,

but that the Quality Assurance provisions may not appear in the Code for one year or more.

He stated that the NRC had requested ASME and National Board to prepare a management plan which would describe the involvement of interfacing organizations in ASME Code work and that the first draft of this plan had been submitted indicating that progress had been made in this area.

He indicated that the NRC had requested that ASME undertake the requirements for the operability of dynamic components and not just cover the pressure boundary integrity of nuclear components as presently covered by Section III. He stated that this was a long term proposition, possibly two or three years from completion, but progress was being made by the establishment of the development of required standards.

W. Reinmuth stated that under the letters of agreement, the NRC would retain the right to audit manufacturers and organizations involved in the ASME/National Board system and that it may be necessary to intensify such audits in areas where problems were encountered.

W. Reinmuth then outlined some of the areas where NRC considered problems as follows.

He commented that the NRC was somewhat concerned in the matter in which the Authorized Inspection Agencies functioned and suggested that more effective authorized inspection may be obtained if the inspection contract or agreement was with the ASME Certificate Holder and the User (Utility) of the Nuclear Component rather than with the ASME Code Certificate Holder and the Authorized Inspection Agency. He remarked that in some instances, the authorized inspection service provided by the states was not too effective in view of the fact that the jurisdictions had problems in obtaining adequate funding for authorized inspection functions.

W. Reinmuth commented that there was a considerable variability in the implementation of various ASME manufacturer's Quality Assurance Programs especially in the area of hold points, the Authorized Nuclear Inspector signing ASME manufacturers data reports where deficiencies possibly existed, lack of technical support to the Authorized Nuclear Inspector from the Authorized Inspection Agency, long term assignment of Authorized Nuclear Inspectors at an ASME manufacturer's plant which could lead to ineffective inspection, lack of involvement and participation of the Authorized Nuclear Inspector and his Supervisor during ASME shop reviews. In this connection, W. Reinmuth stated that the Authorized Inspection Agency representatives should be more aggressive during these surveys. He also stated that there appeared to be lack of documentation of the findings of the Authorized Nuclear Inspector Supervisors' audits.

W. Reinmuth emphasized that, in general, the Authorized Nuclear Inspector did not consider a violation of the manufacturer's Quality Assurance Program a violation of ASME Code requirements and the Inspector appeared to be more concerned with violations of a "hardware classification" rather than a Q.A. Program violation.

8. CLOSING REMARKS - S. F. HARRISON

S. F. Harrison again reiterated that a comprehensive written Quality Control System and strict implementation of the system was the key to ensure that the requirements of the ASME Code were followed. He stated that since the provisions in the written Quality Control System were considered to be ASME requirements, it was essential that the Authorized Inspector and the Authorized Inspector Supervisor, by monitoring the activities of the Authorized Inspector, ensure that the hardware and all provisions of the written Quality Control System were adhered to.

He stated that in view of the many hundreds of thousands of ASME Code vessels fabricated, the Authorized Inspection Agencies, in general, were fulfilling their duties. However, in view of the investigations which the National Board had found necessary to have carried out in the past year, a concerted effort was necessary on the part of all concerned to continually improve the activities of the Authorized Inspector.

9. GENERAL DISCUSSION

It was stated that the Authorized Inspection Agencies, the Jurisdictions, and the National Board must collectively work together to obtain Code compliance of ASME fabricated objects and the Authorized Inspection Agencies are relied upon for direction in this area. It was suggested that administrative directives be prepared by the National Board for this purpose.

In reply to a question, W. Garvin stated that although an altered data report was still accepted by the National Board for work involving alterations to an ASME/National Board stamped boiler or pressure vessel, the 1979 Edition of the National Board Inspection Code did not recognize this procedure. He stated that the procedure in the National Board Inspection Code was for the organization responsible for carrying out the alteration, to complete the R-1 Form and give a comprehensive description of the work involved and attach a copy of the original manufacturer's data report to the R-1 Form and submit it to the National Board.

In response to a question, S. F. Harrison stated that the requirements for an Authorized Inspector Supervisor as shown in the National Board By-Laws was mandatory on July 1, 1974.

A comment was made that in some instances, inconsistencies amongst the Team Leaders was reported. S. F. Harrison stated that the National Board was required to engage many Consultants for this purpose. He also stated that once each year a seminar is held at which time all National Board Consultants and Staff discuss the various aspects of conducting reviews in an effort to eliminate inconsistencies.

In reply to a comment that jurisdictional representatives on review teams appeared to lack knowledge of the ASME Code requirements, S. F. Harrison replied that the jurisdictional authorities were invited to all National Board Consultants Seminars.

C. Hale of the U. S. NRC stated that in his opinion, inconsistencies in the function of ASME Nuclear Survey Team Leaders appeared to be minimal.

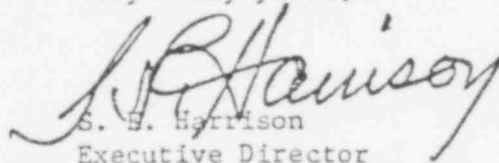
C. Hale stated that in his opinion, there appeared to be an atmosphere of competitiveness between the Authorized Inspection Agency representatives and the ASME representatives.

In reply to a question regarding authorization for manufacturers to register vessels with the National Board, S. F. Harrison stated that unless a National Board representative participated on the review for the manufacturer's ASME Certificate of Authorization issuance, it was necessary for the manufacturer to submit his Quality Control Manual and a typical welding procedure specification and performance qualification record to the National Board before the National Board authorization would be granted.

In reply to a question regarding National Board registration, S. F. Harrison stated that some Authorized Inspectors and Authorized Inspector Supervisors apparently were advising manufacturers that there was no benefit of registering ASME boilers and pressure vessels in non-Code states and in jurisdictions which did not have this as a mandatory requirement. He stated that although registration with the National Board may not be mandatory in such areas, it was to the owners advantage to ensure National Board registration since in the event that the object were moved from one jurisdiction to another, or if repairs were necessary in future years, it was essential that a copy of the data report be available. He noted that the manufacturer was only required by Code requirements to retain the data report for a period of only five years whereas the data report of an object registered with the National Board was on permanent file.

Before the meeting adjourned at 3:00 P.M., S. F. Harrison stated that the National Board will hold another meeting of Authorized Inspection Agencies on Wednesday, March 19, 1980.

Very truly yours,


S. F. Harrison
Executive Director

SFH:jl

cc: Authorized Inspection Agencies (Insurance Companies)
Authorized Inspection Agencies (Jurisdictions)
U. S. Nuclear Regulatory Commission
National Board Staff

307291