

**BOILER SAFETY INTERPRETATION/TECHNICAL LETTER  
BSI24**

**MEMORANDUM**

TO: All Commissioned Inspectors Performing Certificate Inspections

FROM: Fred P. Barton, Chief Inspector  
Boiler Safety Compliance Program

SUBJECT: **Issues for 2006**

DATE: February 7, 2006

Recently certain issues have come to my attention that need to be addressed. In particular, overdue inspections are still an issue with some inspection companies, requiring stronger action.

A. Unregistered Boilers or Pressure Vessels

From time to time Inspectors still find unregistered pressure vessels, air tanks or hydropneumatic tanks in particular, that were installed prior to 1974.

The pressure vessels deserve some special attention now that they have been in service over 30 years without inspections. Effective 4/1/06 any unregistered boiler or pressure vessel that was built or installed prior to 1974 will need thickness readings taken.

For non-Code objects, treat the object as non-standard in determining the MAWP per the Boiler Rules and Regulations. For ASME stamped objects either the formula found in the ASME Code up to the 1999 Addenda or Boiler Rules may be used. Older editions of the ASME Code are available from the National Board at a nominal cost. In all cases use the actual thickness found in determining the MAWP.

The Inspector's Calculations for the MAWP must be provided on the BPV-5 (i.e. NB-5) form.

Our Boiler Rules and Regulations allow for an internal inspection of a pressure vessel if the Inspector believes it is necessary.

## B. External Inspections of High Pressure Boilers

The Virginia Code and the Virginia Boiler Rules and Regulations both state that recertification of high pressure boilers depends on an annual internal inspection for certification and shall also be externally inspected annually while in operation if possible. The condition “if possible” applies to while the boiler is in operation and not the actual external inspection.

It has recently come to my attention that not all Inspectors are performing external inspections in addition to the internal inspection for the certificate. External inspections are extremely important for checking of various controls and the visual check of the boiler and its system. In Virginia there is no time period specified for the external inspection. The external inspection can be performed six (6) months before or after the internal, or a few days/hours before or after the internal inspection.

Documentation of the external inspection shall be combined with the annual internal inspection for the certificate by a notation under “Conditions”. No separate report is required.

## C. Overdue Inspection

The number of overdue inspections remains high. Considerable effort has been made over the years to reduce the overdue inspections without meaningful results. There will be a mandatory meeting this spring of all Inspectors providing Certificate inspections in Virginia from the following companies:

American Boiler Inspection Services, Inc.  
Chubb  
CNA Insurance Company  
Hartford Steam Boiler  
Seneca Insurance  
St. Paul Travelers

The meeting will be held in conjunction with the spring meeting of the Virginia Boiler and Pressure Vessel Inspectors Association to minimize travel expenses.

If you have any questions on the above call me at (804) 786-3262 or email me at [fred.barton@doli.virginia.gov](mailto:fred.barton@doli.virginia.gov)

FPB/fs