Los Alamos NATIONAL LABORATORY EST.1943

Conduct of Engineering
Formal Clarification or Interpretation Request

Assigned by Responder: ☐ Clarification ☒ Interpretation Tracking number CIR-__23-002_____

Clarify	To make the CoE document or its references understandable and free from confusion
Interpret	To formally provide an acceptable method of compliance with the document or references

1.0 Request

Brief Title: Initial Service Leak Test Methods for Tie-In to Existing (Legacy) B31.3 and B31.9 Piping
Affected Document Title, Number, and Rev. No. LANL Engineering Standards Manual (ESM), STD-342-100 Chapter 17, Pressure Safety, Section EXIST Rev. 2 05/25/17
Section/Article/Para and Existing Wording VAR-10163, In Process Examination of Tie-in to Existing Contaminated Piping VAR-10198, In-process Examination of Tie-in to Existing Contaminated Wet Vac Piping
Inquiry (describe ambiguity or issue) May VAR-10163 and VAR-10198 be used to examine the final joint of a vacuum system that is—or is not—associated with radiological contamination?

Requestor (LANL employee)	Z Number	Organization	Date
Shawn M. Wright	357332	PIE-4	02/22/2023

2.0 Response by Safety (or Security) Management Program Owner Representative (SMPOR/POC)

This Interpretation is applicable to any construction that modifies an existing pressure system.

In short, yes. VAR-10163 and VAR-10198 may be used to examine the final joint of a vacuum system that is—or is not—associated with radiological contamination.

Caveats/Basis:

It is expected that the requirements of ESM Chapter 17, *Pressure Safety* (or the Tailored Standards Manual) will be met even if project specifications do not specifically cite the requirement. As such, all construction that alters existing pressure systems shall comply with the requirements under *EXIST*, paragraph 3.B. *EXIST* article 3.0 was created to specifically address the joint(s) connecting new construction or a new modification to existing pressures systems. ASME B31.3 and ASME B31.9 piping codes only apply to new construction; LANL uses selected aspects of them for modifying an existing system.

Name	Z Number	Signature/Date
Ari (Ben) Swartz	235211	ARI SWARTZ (Affiliate) Digitally signed by ARI SWARTZ (Affiliate) Date: 2023.03.07 09:57:01 -07'00'

3.0 SMPO Approval (Standards Manual and code and regulation matters only, otherwise N/A)

Comments

On February 9, 2023, Michael Ladach, the POC for ESM Chapter 6, Mechanical and Master Specification Section 22 0813 on testing also agreed with this bag-test usage with the statement “I would say yes, we can use

the bag joint test for non-contaminated joints also. There is less risk with the process since there is no contamination, thus no need for the portion of the procedure that mentions sampling and/or monitoring.”		
Name Dan Tepley	Z Number 185676	Signature/Date DANIEL TEPLEY (Affiliate) Digitally signed by DANIEL TEPLEY (Affiliate) DN: c=US, o=U.S. Government, ou=Department of Energy, 0.9.2342.19200300.100.1.1=89001000505451, cn=DANIEL TEPLEY (Affiliate) Date: 2023.03.09 08:41:48 -07'00'

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