



Conduct of Engineering Formal Clarification or Interpretation Request

Assigned by Responder: ☒ Clarification ☐ Interpretation Tracking number CIR-26-003

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: Calibration Requirements for Leak Testing			
Affected Document Title, Number, and Rev. No. ESM Chapter 17, <i>Pressure Safety</i> , Rev 1 6/11/2025			
Section/Article/Para and Existing Wording Section PS-REQUIREMENTS 10.3 PRESSURE AND LEAK TESTING, A. General Requirements, paragraph 16 "16. Test instrumentation used to meet the pressure and leak testing requirements of this document must be calibrated as required by P330-2, <i>Control and Calibration of Measuring and Test Equipment (M&TE)</i> ." 10.3 PRESSURE AND LEAK TESTING, B. Modifications to Existing Systems, paragraph 1, c. 1) Note. "NOTE: The procedure for executing the in-service testing defined does not require any instrumentation (e.g., calibrated pressure indicator, reference indicator on system, etc.)"			
Inquiry (describe ambiguity or issue) Is calibrated instrumentation used for in-service leak testing required?			
Requestor (LANL employee) Ari (Ben) Swartz	Z Number 235211	Organization PFE-DO	Date 07/14/2026

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

No, ASME Codes apply to construction not to modification or maintenance of existing equipment. Modifications performed to systems meeting the criteria of 10.3 PRESSURE AND LEAK TESTING, B. Modifications to Existing Systems, are to use the reference gauges normally used to operate the system to establish the "normal operational pressure" for the in-service test. In some cases, it may not even be applicable to have an instrument. For example, a vacuum test connection for a system like wet vacuum or dry vacuum. Those in-service tests are performed at whatever vacuum the system is providing. The vacuum is assumed to be functional and adequate for the application. The in-service test is not to determine the adequacy of the existing system. If an adequacy test is required, additional requirements must be defined in the testing plan.			
Name Ari (Ben) Swartz	Z Number 235211	Signature Signature on file with ES-DO	Date 07/14/2026

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

Comments			
Name Robert L. Swickley	Z Number 228406	Signature Signature on file with ES-DO	Date 08/14/2026

Distribution (may be electronic): Requestor, SMPOR, SMPO, CENG-OFF Program POC

Instructions

(Backside, need not print, not part of record)

Purpose of Form (Request)

Per PD340 Conduct of Engineering, the applicable Safety (or Security) Management Program Owner (SMPO) or their delegated representative (SMPOR) may clarify or interpret Conduct of Engineering (CoE) documents and CoE-related references. This form provides a formal means for documenting such actions.

- For the Engineering Standards, the Discipline Points of Contact are the SMPORs and will be listed on the Standards website: <http://engstandards.lanl.gov>. See Engineering Standards Manual Chapter 1 Section Z10 (article on Clarifications, etc.) for details.
- For the other CoE programs (Engineering Processes, Engineering Training & Qualification), the program manager listed on the LANL-internal CENG-OFF website fulfills this SMPOR role.

As an alternative to this form/process, when an informal staff (SMPOR) opinion is desired and sufficient, informal communications such as emails are allowed and encouraged; however, responses are an unofficial opinion and should be noted as such.

Variances and alternate methods must use LANL Form 2137 instead of this one.

Line-by-Line Instructions

Requests will be categorized as a clarification or interpretation and uniquely numbered by final approver; currently, numbers are obtained from ES-DO (6-0600) and are in the format CIR-YEAR-XXX.Y, where XXX is a sequential number and Y is the rev (e.g., CIR-2010-001.0).

1.0 Request

Title: Create a short descriptive subject

Affected Documents: List document(s) affected. Limited to a single topic/concept for simplicity as practical.

Inquiry: Describe the ambiguity or issue. Use and reference continuation sheets and attachments as necessary.

Requestor: This must be a LANL employee (outside firms must request through their LANL contact). Requestor forwards to the appropriate SMPOR (contact CENG-OFF when unsure).

2.0 Response

Here, the Lab's SMPO or their representative (SMPOR) in the functional area provides a response.

3.0 Additional Approvals

Matters relating to Engineering Standards Manual, contractual, and code or regulation issues require SMPO approvals (see ESM Chapter 1 Section Z10). When not used, N/A.

Requestor will be notified and provided final copy by admin.

Copies of all requests (approved and otherwise) will be retained in the CoE records. Those providing value to multiple projects may be posted on the CoE webpages until affected documents are updated to incorporate, as appropriate.

Note: If and when this form or an alternative to this form (with different format, content, or automation) is made available on the Engineering SharePoint site by the Conduct of Engineering Office, such documents/processes shall be considered acceptable substitutes.