

## Conduct of Engineering Request for Variance or Alternate Method

To display the *VAR Request Metadata* pane for this document, click **File > Info > Properties > Show Document Panel.**

### 1.0 General

1.1 Document Number: <b>VAR-10429</b>	1.2 Revision: <b>0</b>				
1.3 Brief Descriptive Title: <b>Relief Device Settings for Pneumatic Testing</b>					
1.4 Affected Program: <b>Engineering Standards</b>	1.5 Request Type: <b>Variance</b>				
1.6a Affected Tech Area <b>99</b>	1.6b Affected Buildings <b>Sitewide</b>				
1.7 Requestor: <b>Swartz, Ari Ben</b> Organization: <b>ES-EPD</b>					
1.8 Revision History <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left; border-bottom: 1px solid black;">Revision Number</th> <th style="text-align: left; border-bottom: 1px solid black;">Changes and Comments</th> </tr> </thead> <tbody> <tr> <td style="padding: 2px 5px;"><b>0</b></td> <td style="padding: 2px 5px;"><b>Initial issue.</b></td> </tr> </tbody> </table>		Revision Number	Changes and Comments	<b>0</b>	<b>Initial issue.</b>
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<b>0</b>	<b>Initial issue.</b>				

### 2.0 Affected Conduct of Engineering Program/Documents

2.1 Affected "P" Document: <b>P342 Engineering Standards</b>  If against the P document itself, revision (or <b>N/A</b> ): <p style="text-align: center;"><b>N/A</b></p>	2.2 Subordinate or related document(s) [AP, master spec, LANL ESM chapter & section; or code, Order, standard, etc.]: Document Title/No.: <b>Engineering Standards Manual Chapter 17, Pressure Safety, Section ADMIN-4 Inspection and Testing</b>  Revision <b>1</b> Document Title/No.: <i>Enter text..</i>  Revision <i>Enter text..</i> Document Title/No.: <i>Enter text..</i>  Revision <i>Enter text..</i>
2.3 Section/Paragraph: <b>1.0 Inspection and Testing, B. Testing, 6. c.</b>	
2.4 Specific Requirement(s) as Written in the Document(s): <b>If the first and second requirements above are satisfied then a relief device is not required if the test pressure is not above the MAWP of the piping components.</b>  <b>Example: The tubing MAWP is 2199 psig. The pressure testing supply gas has an adequately supplied relief valve set at 200 psig. The design pressure is 100 psig. No additional relief protection is required</b>	
2.5 Contractual, preference, or other basis for requirement in 2.4: <b>Contractual. Chapter 17 implements 10 CFR 851 Worker Safety and Health Program Description as described by PD 100, DOE/NNSA Approved Los Alamos National Laboratory. 10CFR851 requires that pressure systems</b>	

be tested per ASME or equivalent and, by implication, done so in a safe manner (as do other 10CFR851 general statements). This variance eliminates a LANL exception to the ASME B31 series, better aligning LANL to same.

2.6 Type of VAR from ESM Chap 1, Z10 [*Applies only to standards variances*]  
 Type 2

2.7 Discipline  
 Pressure Safety

### 3.0 Request Information & Comments

3.1 NCR required (work has occurred)? **No**  
 If Yes, NCR Number: [Enter text.](#)

3.2 System/Component Affected  
 OpSystem Acronym & Name [[Select OpSysAcronymAndName](#)]  
 System Number or Name [[Select SystemNumberOrName](#)]

3.3 Highest ML Level  
 ML-1

3.4 Proposal with Justification/Compensatory Measures:

#### Proposal

Delete paragraph 1.B.6.c. including its example (shown above in field 2.4).

#### Justification

Removing this practice is required by new ASME B31.3 Interpretation 20-1150 (copy attached), enhances safety of testing, better aligns LANL with code, and simplifies the LANL program. ESM Chapter 1 Section Z10 r14, 5.0 Codes and Standards, D. National consensus codes and standards, states: "3. Official interpretations shall be utilized as if written in the ESM/code/standard itself."

3.5 Attachments

Document Title or Description **ASME B31.3 Interpretation 20-1150** 

3.6a Project ID  
 N/A

3.6b: Project Name  
 N/A

3.6c: Code of Record Date  
 B31.3 2018

3.7 Duration:  
 Lifetime

3.8a If Finite Period, Start Date:  
[Click to enter a date.](#)

3.8b End Date:  
[Click to enter a date](#)

3.8c Provide the PFITS number for tracking removal/correction: [[PFITSNum](#)]

3.9 USQD/USID required (Nuclear, High/Mod Hazard)? **No**  
 If Yes, USQD/USID Number [Click here to enter text.](#)

3.10 QA Review for process change matters potentially affecting LANL's NQA-1 implementation

Is a QPA Determination required?: **No** If **Yes**, then: [Choose an item.](#)  
 QPA Comments: [Enter text..](#)

3.11 POC Determination: **Accept**  
 POC Comments: [Enter text..](#)

3.12 Management Program Owner's (SMPO) Approval for P341 and APs; P342, ESM, ML-1 and -2, and Contract Matters; and P343

SMPO Determination: **Accept**

Comments: [Enter text..](#)

**4.0 Participant Signatures** **NOTE:** DO NOT ADD NAMES FROM WITHIN WORD! *Save and close the form first, then do 1-4 below:*

1. From the SharePoint library, select the document, then click the **ellipsis** (...) in the second column; a small dialog appears
2. In the small dialog click the **ellipsis** again
3. Click **Edit Properties** and check out the document if prompted to Enter names using the controls provided, then **Save**

<p>4.1 POC (Management Program Owner's Representative):</p> <p><b>Swartz, Ari Ben</b></p>	<p>Organization <b>ES-EPD</b></p>	<p>Signature</p>
<p>4.2 Facility Design Authority Representative</p> <p>[FDARName]</p> <p>FDAR signature not required <input checked="" type="checkbox"/></p>	<p>Organization <a href="#">Enter text..</a></p>	<p>Signature</p>
<p>4.3 LANL Owning Manager (FOD or R&amp;D/Program)</p> <p>[FODorPrgmMgrName]</p> <p>FOD or Program Manager signature not required <input checked="" type="checkbox"/></p>	<p>Organization <a href="#">Enter text..</a></p>	<p>Signature</p>
<p>4.4 Quality Reviewer's Name:</p> <p>[QPAName]</p> <p>QPA review/signature not required <input checked="" type="checkbox"/></p>	<p>Organization <a href="#">Enter text.</a></p>	<p>Signature</p>
<p>4.5 Safety or Security Management Program Owner's Approval for P341 and APs; P342, ESM and Contract Matters; and P343</p> <p><b>Streit, Jim</b></p> <p>SMPO signature not required (Type 1 variance) <input type="checkbox"/></p>	<p>Organization <b>ES-DO</b></p>	<p>Signature</p>

<p>4.6 Additional Signer 1</p> <p>Apperson, Jason Wesley</p> <p>Role: Pressure Safety Committee</p>	<p>Organization</p> <p>ES-DO</p>	<p>Signature</p>
<p>4.7 Additional Signer 2</p> <p>[AdditionalSigner2]</p> <p>Role: Enter text.</p>	<p>Organization</p> <p>Enter text.</p>	<p>Signature</p>
<p>4.8 CoE Administrator Signature</p> <p>Salazar-Barnes, Christina L</p> <p><b>NOTE:</b> The CoE Admin is always the last signature placed on this document. The date of that signing is the date of this document.</p>	<p>Signature</p>	