



Standards and Certification Training

Module B – Process B11. Standards Inquiries, Interpretations and Cases

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Updates

12/7/2015 Revised slides 3-7, 9 and 16. Added Slides 8, 14 and 17-19

3/14/2014 First Edition

Module B Course Outline

- B1. ASME Organizational Structure
- B2. Standards Development: Staff and Volunteer Roles and Responsibilities
- B3. Conformity Assessment: Staff and Volunteer Roles and Responsibilities
- B4. Initiating and Terminating Standards Projects
- B5. Consensus Process for Standards Development
 - B5a. Project Management
- B6. The Basics of Parliamentary Procedure
- B7. The Appeals Process
- B8. International Standards Development
- B9. ASME Conformity Assessment Programs
- B10. Performance Based Standards



B11. Standards Inquiries, Interpretations and Cases

Module B contains eleven modules. We will cover B11 – Standards Inquiries, Interpretations and Cases.

LEARNING OBJECTIVES

At the end of this module you will be able to understand:

- What is an Interpretation
- How to submit an inquiry or request for Interpretation online
- The approval process for an Interpretation
- How to search for approved Interpretations online
- What a case is and why they are used
- The approval process for a Case

At the end of this module you will know...

- What is an Interpretation
- How to submit an inquiry or a Request for Interpretation
- The approval process for an Interpretation
- How to search for approved Interpretations online
- What is a Case
- The approval process for a Case

COMMITTEE RESPONSE TO AN INQUIRY

- Inquiries can be submitted by anyone.
- The avenues in which a Committee may address an inquiry:
 - Informal Responses
 - Requests for Revision
 - Interpretations
 - Cases

- Inquiries can be submitted by anyone. This could include members of the public, users of the standards, purchasers of ASME stamped products, other ASME S&C committees, certificate holders, etc.
- Due to the impact ASME Codes and Standards have on various industries, there are a few avenues in which a Committee may address an inquiry:
 - Informal responses can be given by Staff Secretaries or volunteers. Informal responses could include referencing the inquirer to previous interpretations or other sections of the standard. The responses may be either verbal or in writing and should include a clear statement by the staff person or volunteer that he or she is expressing his or her *opinion* and not an interpretation. Informal responses are not given on ASME Interpretation letterhead.
 - Requests for revision to a standard, such as proposed technical changes, editorial changes or errata, are forwarded to the appropriate committee for consideration. These are addressed directly to the staff.
 - Interpretations are a formal response to a written inquiry and the response is prepared on official ASME interpretation letterhead.
 - Cases are used to provide alternatives to existing requirements, or to allow early and urgent implementation of a revised requirement.

For the rest of this module we will focus on Interpretations and Cases.

INTERPRETATION REQUESTS TO ASME DEVELOPMENT COMMITTEES

- How to Submit a Request for Interpretation:
 - Online using the Interpretation Submittal Form at...

<http://cstools.asme.org/Interpretation/InterpretationForm.cfm>

Interpretations should be submitted using the Interpretation Submittal Form online. The submittal form can be accessed online at: www.ASME.org > About ASME > Get Involved > Standards & Certification Development Committees > Contact Committees or through the link shown here.

Note: ASME does not approve, certify, rate or endorse any item, construction, proprietary device or activity nor does staff provide consulting advice.

INTERPRETATION SUBMITTAL FORM 1/3

Interpretation Submittal Form

[Search Interpretation](#)

* Denotes required field

1. Inquirer Information [Sample Interpretation Submittal Form](#)

First Name: * Last Name: *

Company/Organization:

Address 1: *

Address 2:

Address 3:

Country: * State: *

Town/City: * Zip/Postal Code: *

Phone: Fax:

Email: * Confirm Email: *

2. Request for Interpretation

Standard Designation: *

NOTE: To select, highlight the Standard Designation.

Start typing to file

A13.1
A17.1
A17.2
A17.3
A17.4
A17.5

NOTE: If your question(s) applies to more than one standard, select the most appropriate standard and reference any others in your inquiry.

NOTE: Interpretations are not issued for the following ASME Standards
A112.4.7
A112.6.5
A112.18.6
A112.19.8M
A112.20.1
A112.20.2

Here is the Interpretations Submittal Form.

As noted here, the inquirer's name and address are required.

Standards designations must be selected by highlighting the standard designation so that the inquiry is directed to the correct staff secretary .

Note: if your question(s) applies (y) to more than one standard, select the most appropriate standard and reference any others in your inquiry.

INTERPRETATION SUBMITTAL FORM 2/3

Edition/Addenda: *	<input type="text" value="Start typing"/>
Paragraph/Fig./Table No.: *	<input type="text"/>
<small>Enter req. number</small>	
Subject:	<input type="text"/>
<small>Enter brief (1 or 2 word) description</small>	
Inquiry(ies): *	<input type="text"/>
<small>Please provide a condensed and precise question, omitting superfluous background information and composed in such a way that a 'yes' or a 'no' reply is acceptable. Please cite the specific paragraph number in your question(s).</small>	
Proposed Reply(ies):	<input type="text"/>
<small>Replies should be in the form of a Yes or No answer with explanation as needed. If entering replies to more than one question, please be sure to number your questions and replies.</small>	
Background Info:	<input type="text"/>
<small>Please provide the committee with any background information that will assist the committee in understanding the inquiry.</small>	

The second part of the Interpretation Submittal Form is where the inquiry, proposed reply, background and applicable editions are provided. The submitter should be as specific as possible.

For the inquiry, the interpretation submittal form gives guidance on how to submit your inquiry. The question should be submitted in such a way that a 'yes' or a 'no' reply is acceptable. The specific standard number, publication year, addenda (if applicable) and paragraph number must be submitted with your question(s).

The proposed reply should be in the form of a Yes or No answer with explanation as needed. If entering replies to more than one question, please be sure to number your questions and replies.

Background information can be added that will assist the committee in understanding the inquiry and an attachment can be added.

INTERPRETATION SUBMITTAL FORM 3/3

3. Important, Please Read

Requests for interpretation must be limited to an interpretation of a particular requirement in the Standard or Code Case. ASME does not "approve," "certify," "rate," or "endorse" any item, construction, proprietary device, or activity. Additionally, the committees cannot consider consulting type questions such as the following:

- 1) a review of calculations, design drawings, or descriptions of equipment or parts to determine compliance with the requirements in the Standard;
- 2) a request for assistance in performing any Code-prescribed functions related to, but not limited to, material selection, designs, calculations, fabrication, inspection, testing, or installation;
- 3) a request seeking the rationale for a requirement in the Standard since these are based upon consideration of technical data and the experience and expertise of the individual committee members.

If your inquiry does not meet the requirements for submittal as stated above, it may not be accepted by the committee for review.

For all matters other than requests for interpretation, please go to www.asme.org.

Review Information Prior to Submittal

The third part of the Interpretation Submittal Form is where guidance is given to the inquirer.

This section notifies the inquirer that requests for interpretation must be limited to an interpretation of a particular requirement in the Standard or Code Case.

ASME does not "approve," "certify," "rate," or "endorse" any item, construction, proprietary device, or activity.

The committees will not consider consulting type questions such as the following:

- 1) a review of calculations, design drawings, or descriptions of equipment or parts to determine compliance with the requirements in the Standard;
- 2) a request for assistance in performing any Code-prescribed functions related to, but not limited to, material selection, designs, calculations, fabrication, inspection, testing, or installation;
- 3) a request seeking the rationale for a requirement in the Standard since these are based upon consideration of technical data and the experience and expertise of the individual committee members.

If the inquiry does not meet the requirements for submittal, it may not be accepted by the committee for review.

Once the inquirer submits the Interpretation Submittal Form, an auto-notification will provide the tracking number to the inquirer for future reference. An additional auto-notification also informs the Staff Secretary of the submittal.

INTERPRETATIONS SUBMITTED TO ASME DEVELOPMENT COMMITTEES

- Staff Secretary reviews the inquiry request.
- Staff Secretary may contact inquirer if additional information is needed or the question needs to be reformatted.
- Staff Secretary notifies the standards committee officers of the inquiry, if it requires further standards committee action.
- The Chair assigns the inquiry to a group or the whole committee for further review.

- After the Staff Secretary receives the inquiry, the Staff Secretary reviews the inquiry request to determine if it is
 1. A valid Interpretation (we will cover examples of inappropriate requests)
 2. The question is already covered in the standard
 3. The question has been previously answered or
 4. The interpretation or case is in the correct format.
- The Secretary may contact the inquirer if there are any questions and will notify the standards committee Officers of the inquiry, if further standards committee action is required.
- Staff Secretary then notifies the standards committee officers of the inquiry, if it requires further standards committee action.
- The standards committee Chair assigns the inquiry to a group or the whole committee for further review.

TYPES OF INTERPRETATIONS

1) Interpretation

- Clarifies existing requirements where there is ambiguous wording in the standard.

2) Intent Interpretation

- Clarifies ambiguous or incorrect wording in the standard.
- Revision to the standard supporting the interpretation approved before the interpretation may be issued.

There are 2 types of interpretations:

1. An interpretation clarifies existing code requirements where there is ambiguous wording in the standard.
2. An Intent Interpretation clarifies or corrects ambiguous wording in the code and results in a revision to standard. The standard revision is approved by the Consensus Committee before the interpretation response letter may be issued.

Note: Not all Committees respond to interpretation requests. Committees that do will state it in their supplemental procedures. The C&S Connect Interpretation Submittal Form identifies which standards committees do not issue interpretations.

INTERPRETATION APPROVAL

- Approval Options:
 - Consensus Committee
 - Cognizant Subcommittee
 - A Special Committee
- Balance Requirement

Interpretations are approved in accordance with ANSI Accredited Procedures and committee supplemental procedures. Depending on the committee, they could be approved by:

- Consensus Committee
 - Cognizant Subcommittee
- OR
- A Special Committee

No member interest category shall have a majority on any Cognizant Subcommittee or Special Committee approving an Interpretation.

Board and ANSI approval is not needed for interpretations, except for changes to the standard that would be included as part of an intent interpretation.

INTERPRETATION APPROVAL PROCESS CONSENSUS COMMITTEE or SUBCOMMITTEE

- **Vote Options:**
 - Objection, No Objection, Not Voting
- **Meeting Vote**
 - No objection by two thirds of those present needed for approval, if quorum is present
- **Ballot Vote**
 - First Consideration Ballot - no objections, no additional revisions
 - Recirculation Ballot – no objection by 2/3 of the voting members.

Voters are given three voting options: No Objection, Objection, Not Voting. An objection must provide written justification and alternative action that will resolve their objection.

Vote taken at a meeting requires no objection by at least 2/3 of those present and eligible to vote for the interpretation to pass, if a quorum is present.

For ballot vote, the proposal passes on first consideration when there are no objections and no additional revisions. If not, a recirculation ballot will be issued, where no objection by at least two thirds of members voting is required to approve the interpretation.

INTERPRETATION APPROVAL PROCESS SPECIAL COMMITTEE

- Minimum 5 members, including Staff Secretary
- Must be members of the Consensus Committee or a subordinate group
- Appointed by Chair of Standards Committee or Cognizant Subcommittee
- Voting Options: Objection and No Objection.
- All members including Staff Secretary must vote no objection for interpretation to be approved.
- Unresolvable objections should be referred to the consensus committee or Cognizant Subcommittee.

Another option for approving interpretations is by a Special Committee.

- Special Committees must have at least five members, one of which shall be the Staff Secretary responsible for the standard.
- It's membership must be from the consensus committee or a subordinate group.
- Special Committee members shall be appointed by the Chair of the Standards Committee or cognizant subcommittee.
- No member interest category can have a majority on the Special Committee.
- Voters are only provided 2 voting options: Objection and No Objections
- All members including Staff Secretary must vote no objection for interpretation to be approved
- Unresolvable objections should be referred to the Consensus Committee or Cognizant Subcommittee.

INTERPRETATION GUIDANCE

Interpretations should...

- Be written in such a way that a 'yes' or a 'no' reply is acceptable.
- If the initial request is not written in this format, the Staff Secretary can go back to the inquirer and ask for them to revise their questions.
- The committee can rewrite the inquirer's question if it helps to clarify the question and aids in the committees ability to provide a 'yes' or 'no' response.

When the Interpretations are being considered by the committees, they should consider the following when developing the reply...

- Be written in such a way that a 'yes' or a 'no' reply is acceptable.
- If the initial request is not written in this format the Secretary can go back to the inquirer and ask for them to revise their questions.
- The committee can rewrite the inquirer's question if it helps to clarify the question and aids in the committees ability to provide a 'yes' or 'no' response.

INTERPRETATION GUIDANCE

Interpretations shall NOT...

- Include explanations describing why the standard is written the way it is, except they may include rationale, if it was approved through the consensus process as part of the standards action.
- Approve, certify, rate or endorse any item, construction, proprietary device or activity.
- Restate requirements in such a way that opens the door to further confusion.
- State or imply something that cannot be supported by the published standard requirements. Exception: intent interpretations with an approved revision.
- Provide consulting advice.

Interpretations shall NOT...

- Include explanations describing why the standard is written the way it is, except they may include rationale if it was approved through the consensus process as part of the standards action. (Note that most standards committees do not approve rationale.)
- Approve, certify, rate or endorse any item, construction, proprietary device or activity
- Restate requirements in such a way that opens the door to further confusion.
- State or imply something that cannot be supported by the published standard requirement. The exception to this in the case of intent interpretations where the revision must be approved before the committee can publish the interpretation.
- Consider consulting type questions such as the following:
 - 1) a review of calculations, design drawings, or descriptions of equipment or parts to determine compliance with the requirements in the Standard;
 - 2) a request for assistance in performing any Code-prescribed functions related to, but not limited to, material selection, designs, calculations, fabrication, inspection, testing, or installation;
 - 3) a request seeking the rationale for a requirement in the Standard since these are based upon consideration of technical data and the experience and expertise of the individual committee members.

ISSUED INTERPRETATIONS

- Interpretations are issued on ASME letterhead and signed by ASME Staff. The interpretation letter:
 - Provides the question, committee reply, and the Code/Standard applicability.
 - Informs the reader of their right to appeal if they are not satisfied with the committee's response.
- Issued interpretations are accessible via database on C&S Connect at:
 - <http://cstools.asme.org/Interpretation/SearchInterpretation.cfm>
- Existing interpretations may be revised if there is an identified need, such as correction or clarification.
- All future interpretations will only be published online.

Committee issued interpretations are transmitted on ASME letterhead and signed by ASME Staff.

- The letter will include the question, committee reply, and the code or standard edition applicability or the publication the question is in reference to.
- The letter will also inform the reader of their right to appeal if they are not satisfied with the committee's response.
- Once approved, the question and reply with applicability will be accessible via the database on C&S Connect
- Existing interpretations may be revised if there is an identified need, such as a correction or clarification.
- In the future, interpretations will only be published online. Historical interpretations may be available through a committee's web page.

INTERPRETATION SEARCH FORM 1/3

ASME Interpretations Database

[Submit Interpretation](#)

Search for Issued Interpretations
The database contains interpretations to ASME codes and standards issued after December 15, 2012, as well as historical interpretations to the Boiler and Pressure Vessel Code. The database is a work in progress and will be updated to include historical interpretations for all ASME codes and standards, where applicable. If you have any questions or comments, please email them to code@asme.org.

OR

Check the status of your Pending Interpretation

Record #

Standard Designation:
A13.1
A17.1
A17.2
A17.3

Record #:

Historical Record/Interpretation #:

Edition/Addenda:

Subject:

Date of Issuance: to

Keyword:

APPLICABILITY OF INTERPRETATIONS
Each interpretation applies to the addition and addenda or supplement listed for that inquiry including prior and previous editions where the requirement is identical. Many of the requirements on which the interpretations have been made are revised in later editions, addenda or supplements. Where such revisions have been made, the interpretations may no longer be applicable to the revised requirement. ASME procedures provide for reconsideration of these interpretations when or if additional information is available which might affect any interpretation. Further, persons aggrieved by any interpretation may appeal to the respective ASME committee or subcommittee. ASME does not "approve", "certify", "rate" or "endorse" any item, construction, proprietary device, or activity.

Here is the Interpretations Search Form. This form can be accessed through the URL on the previous page.

To search for issued interpretations, you can use any of the fields to locate interpretations

- Search by standards designation - start typing the standard designator, then highlight the standard
- Record #
- Historical or Interpretation number
- Edition
- Subject
- Dates of issuance range or
- Keyword.

The check the Status of your pending interpretation box on the right hand side allows inquirers who are outside the committee to have access to the status of their pending interpretation. The record number was sent to the inquirer when the interpretation was submitted.

INTERPRETATION SEARCH FORM 2/3

ASME Interpretations Database

[Submit Interpretation](#)

Search Results: 382 Record(s) Found

Standard	Record #	Historical Interpretation #	Edition	Subject	Date of Issuance	Select Interpretation to be Displayed
B31.1		1-17		Size Limitations for Couplings in paragraph 104.3.1	08/18/80	<input type="checkbox"/>
B31.1		1-16		Paragraph 136.4.2: Visual Examination	07/28/80	<input type="checkbox"/>
B31.1		1-15		Paragraph 123.2.8: Nonmetallic Pipe	07/28/80	<input type="checkbox"/>
B31.1		1-14		Paragraph 104.3.1 (D.2.2): Reinforcement Area in Branch Connections	07/22/80	<input type="checkbox"/>

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The resulting matches that are found will be displayed as shown above. You can click on the Subject to view the interpretation. If you wish to view multiple interpretations, click the boxes under the “Select Interpretation to be Displayed” column and click on the “display selected interpretation” button at the bottom of the page.

INTERPRETATION SEARCH FORM 3/3

Interpretation Detail [Print to PDF](#)

Standard Designation:	B31.1
Edition/Addenda:	2007-2014
Para./Fig./Table No.:	Table B-2.2.1
Subject Description:	Table B-2.2.1 Pressure Safety Valve
Date Issued:	06/25/2015
Record Number:	14-680
Historical Interpretation numbers:	
Question(s) and Reply(s):	<p>Question 1: The second line of Table B-2.2.1 says that it is for Vented Steam but example B-7.1.1, a few pages later, uses this line for superheated steam. Is that because the values in the table are based on the safety valve inlet conditions as opposed to the inlet conditions?</p> <p>Reply 1: Yes</p> <p>Question 2: In this table, is the comma between quality and pressure an implied "and"?</p> <p>Reply 2: Yes</p> <p>Question 3: Are the values of a and b presented in Table B-2.2.1 only valid for steam with an enthalpy of up to 1,600 BTU/lbm?</p> <p>Reply 3: Yes</p>
Standard Designation:	B31.1
Edition/Addenda:	2004
Para./Fig./Table No.:	134.4.2
Subject Description:	Visual Examination
Date Issued:	01/15/2015
Record Number:	15-49
Historical Interpretation numbers:	
Question(s) and Reply(s):	<p>Question: Per B31.1 - 2004, would a weld previously examined, accepted and documented in accordance with paragraph 134.4.2 (Visual Examination) where the ID surface of the weld becomes readily accessible during subsequent fabrication or modification activities require re-examination?</p> <p>Reply: No</p>

The interpretation details will then be displayed as shown above. To download the interpretations into a PDF file, click on the “Print to PDF” at the top of the sheet.

CASES

- Are intended to be incorporated into the standard at a later date.
- Provide alternatives or additions to existing requirements
 - Permission to use new materials
 - Permission to use alternative methods and technologies
- Allow early and urgent implementation of a revised requirement.
- Can be requested by an inquirer or initiated by a committee.

Cases are intended to be incorporated into the standard at a later date.

Cases provide alternatives to existing requirements. For example, a Case may permit the use of new material or alternate methods and technologies

Cases can also allow early implementation of any urgent revision because it is usually faster to generate a case than to revise the code or standard and wait for it to be published in the next new edition.

Cases can be requested directly by an inquirer or initiated by a committee.

CASES

Characteristics

- “Inquiry and reply” format
- Conditions of use clearly stated
- Approval by
 - Consensus Committee
 - Supervisory Board
 - Not ANSI Approved
- Effective after Supervisory Board approval
- Not automatically included in standards requirements
- Conformity Assessment Department must be notified

Characteristics:

- Cases are presented in an “inquiry and reply” format.
- Cases clearly state the conditions under which the case may be used.
- Cases require Consensus Committee approval, Supervisory Board approval, but do not require ANSI Approval.
- Cases may be used as soon as they receive Supervisory Board approval.
- Cases are not automatically included as part of the requirements.
- Committees which develop requirements associated with accreditation or certification programs are responsible for notifying the Conformity Assessment Department when proposed revisions or Cases may affect those activities. This will be discussed more fully in Module B9 – ASME Conformity Assessment Programs.

CASES

Caution

Should not be used by standard users unless accepted by purchasers and/or authorities in jurisdiction where component will be installed.

Caution:

Users of a standard are cautioned against making use of Cases without having the assurance that they have been accepted by the purchaser and/or the proper authorities in the jurisdiction where the component is to be installed.

MODULE SUMMARY

- The method of submitting an inquiry is online at...
<http://cstools.asme.org/Interpretation/InterpretationForm.cfm>
- Interpretations clarify or correct ambiguous wording in the standard.
- Intent Interpretations clarify or correct ambiguous wording in the standard but results in a revision to the standard.

In summary:

- The highly preferred method of submitting an inquiry is online at...

<http://cstools.asme.org/Interpretation/InterpretationForm.cfm>

- Interpretations clarify or correct ambiguous wording in the standard.
- Intent Interpretations clarify or correct ambiguous wording in the standard but results in a revision to standard.

MODULE SUMMARY

- Interpretations are approved by the Consensus Committee, Cognizant Subcommittee or Special Committee.
- Cases are used to provide alternatives to existing requirements, or to allow early and urgent implementation of a revised requirement.
- Cases require Consensus Committee and Supervisory Board approval, but do not require ANSI approval.

- Interpretations are approved by The Consensus Committee, Cognizant Subcommittee or Special Committee.
- Code cases are used to provide alternatives to existing requirements, or to allow early and urgent implementation of a revised requirement.
- Cases require Consensus Committee and Supervisory Board approval, but do not require ANSI approval.

REFERENCES

- Standards and Certification Operations Guide
<http://cstools.asme.org/csconnect/pdf/CommitteeFiles/23216.pdf>
- Standards Committee Procedures, Supervisory Board Procedures and Committee Handbooks
<http://cstools.asme.org/csconnect/CommitteePages.cfm?Committee=A01000000&Action=7609>
- Codes and Standards Policy 33 (Interpretations)
<http://cstools.asme.org/csconnect/CommitteePages.cfm?Committee=A01000000&Action=7609>