

Ballot	6949	Name	API 510, 12th Edition		Report Date:	3/4/2026	Closing Date	4/8/2026
		Proposal	To review, comment and vote on API 510, 12th edition (Pressure Vessel Inspection Code: In-service Inspection, Rerating, Repair, and Alteration). Be sure to examine the document carefully and thoroughly, also checking for accuracy with any cited references, cross references, descriptions, terminology, and values. All formatting issues will be addressed by the API editors.					
Sort Key	Name	Vote	Clause Subclause Number	Paragraph2	Type of Comments	Comments	Proposed Change	Comment Resolution
2	Abhishek Gupta	NonVoter	1.1.1	Para 1	Editorial	To align with the title: change to "In-service inspection, rerating, repair and alteration activities	change to "In-service inspection, rerating, repair and alteration activities	Not accepted: "rerating " is already incorporated in the sentence.
4	Darryl Godfrey	Negative	1.1.1	P1S1	Technical	"heat exchanger components" not needed as they are already included in the definition of pressure vessels 3.1.68pressure vesselA container designed to withstand internal and/or external pressure/loads. This pressure may be imposed by the application of heat from a direct or indirect source, or by any combination thereof or by any other source such as a pump or turbine. This definition includes heat exchangers, air coolers, columns, towers, unfired steam generators (boilers), and other vapor generating vessels that use heat from the operation of a processing system or other indirect heat source.	Delete "heat exchanger components"	Accepted
5	Ray Konet	Negative	1.1.1	1s	Technical	Mentioning heat exchanger components is vague and could open a door to interpretation of what components.	Delete "heat exchanger components".	Accepted
3	Abhishek Gupta	NonVoter	1.1.1	Para 1	Editorial	ERROR	Change "process vessels" to "processing equipment"	Not accepted: process vessels is accurate.
1	Terry Blue	Negative	1.1.1	2nd para	Technical	Section 1.1.1 discusses decommissioning primarily in financial terms. In Definition 3.1.1 ("abandoned in place"), the term "decommissioned" is used again, despite having its own definition in 3.1.17, which may create confusion.	Clarify the distinction between abandoned in place and decommissioned. One approach would be to remove the first sentence in Section 1.1.1 (Coverage) and delete the phrase "has been decommissioned with" from Definition 3.1.1.	Add to scoredcard to discuss with committee
11	Brian Boss	Negative	1.1.2	2	Technical	Why strike out inspectors are to be certified as per API 510?	leave as original wording	Not accepted. We can't mandate the use of the ICP.
13	Abhishek Gupta	NonVoter	1.1.2 Intent	Para 1, line 9	Editorial	can we expand this wording to cover all hydrocarbon industries. suggest replacing the refining word with "hydrocarbon"	Replace "refining" with "hydrocarbon"	Not accepted
6	Ray Konet	Negative	1.1.2	3p1s	Technical	PRDs are still a major inspection activity. Don't understand reason to delete reference.Modify reference to indicate it is not all PRDs.	Suggest we keep PRDs but modify to "and the PRDs that protect them".	Accepted
7	Darryl Godfrey	Negative	1.1.2	P3S1	Technical	BASIS for NEGATIVEPRDs have been excluded from scope without any justification. PRDs protect equipment and personnel by opening at predetermined pressures and preventing the adverse consequences of excessive pressures in process systems and storage equipment and are critical safety devices and PSM covered equipment.	Do not delete "and PRDs" from this section and from all other sections where it has been deleted.	Accepted

8	Christopher Archie	Negative	1.1.2	1.1.2	Technical	PRDs are removed from the scope in the 3rd paragraph. API RP 576 is referenced for inspection of PRDs. Removing the requirements from a standard and referring to an RP weakens the inspection requirements. A basis of NEGATIVE vote.	Leave PRDs as part of the scope of this document.	Accepted
9	Christopher Archie	Negative	1.1.2	1.1.2	Technical	PRDs are removed from the scope in the 3rd paragraph. API RP 576 is referenced for inspection of PRDs. Removing the requirements from a standard and referring to an RP weakens the inspection requirements. A basis of NEGATIVE vote.	Leave PRDs as part of the scope of this document.	Noted: Duplicate Comment
10	Mark Geisenhof	Negative	1.1.2	3rd paragraph	Technical	Suggest leaving PRD. PRD was struck in the redlines from The intent of this code is to specify the in-service inspection and condition-monitoring program needed to determine the integrity of pressure vessels and PRDs.	Add PRD back to end of 1st sentence	Accepted
12	Brian Boss	Negative	1.1.2	3	Technical	Don't strike out majority of paragraph "and PRDs. Ther program should..."	leave as original wording	Noted API states not should in forward/intro
14	Brian Boss	Negative	1.1.3	1	Technical	Don't strike out paragraph	leave as original wording	Not accepted. API can't enforce that and can't be included.
16	Jared Williamson	Negative	1.2.2	2nd paragraph	General	In this context, probability is the correct word. API 580 does not seem to use "likelihood" for these purposes. Same issue exists in 3.1.78, 5.2.1, 5.2.2, 5.2.4, 5.6.3.2, & 5.9.2	Change back to "probability"	Accepted
17	Darryl Godfrey	Negative	1.2.2	P2S1	Technical	BASIS for NEGATIVE"probability" has been replaced by "likelihood" throughout this document.This is inconsistent with the definition of risk in API 580 and need to be changed back to probability.	Use "probability" rather than "likelihood" throughout the document when discussing risk and referring to RBI for consistency with API RP 580 and API RP 581 definitions.	Accepted
18	Ray Konet	Negative	1.2.2	2p1s	Technical	Suggest we delete "considered" as this is ambiguous.	Change to "may be included based"	Accepted
15	Brian Boss	Negative	1.2.2	2	Technical	Is the term "Flashers" standard? I think if refering to vacuum distillation column, it should be referred to as such	replace "flasher" with vacuum distillation column	Accepted

19	Robert Sladek	NonVoter	1.2.4	NEW	General	Add verbiage to allow the use of Artificial Intelligence (AI) with mandatory requirements. People are using AI more and more and incorporating in their daily tasks. We need reasonable guardrails to ensure HIL and avoid autonomous solutions.	Artificial Intelligence (AI) and Machine Learning (ML) AI and ML technologies may be used to support the management of pressure vessels and pressure relieving devices to meet the requirements of this Code provided the following conditions are satisfied.1) a procedure shall be developed for each AI/ML tool that describes the intent, restricts the use, defines the inputs, any calculations and outputs, and incorporates human-in-the-loop (HIL) verifications;2) the owner-operator, the engineer and the inspector shall document their review and approval to use each AI/ML tool.3) the vendor shall notify the inspector and engineer prior to using any approved AI tool on any asset;4) the engineer and inspector shall review and approve each use of AI/ML to confirm any calculations or analysis were correctly performed. All such reviews and approvals shall be documented and stored in the equipment file.5) See Part 2	Noted future discussion needed
20	Robert Sladek	NonVoter	1.2.4	NEW	General	AI/ML Part 2	5) the AI tool vendor shall supply the owner-operator all required information to satisfy the requirements of this section.	Noted future discussion needed
23	Denizhan GUL	NonVoter		2 reference with dates	Editorial	For undated reference the latest edition is considered valid, otherwise we need to update each time the reference document is revised	Removal of dates	Not accepted. They have to be dated because we call out specific clauses, table, figures, etc of those documents.
24	Ray Konet	Negative		2 Keep IOWs	Technical	Since the text now uses "shall", don't we need to have 584 normative	Keep API 584	Not accepted. 4.1.4 only states....see 584 for more information.
21	Brian Boss	Negative		2	1 Technical	Why eliminate normative references? 572, 584, 583, 751, ASNT - these are all core documents	leave as original wording, possibly a couple could move to bibliography. Also add API 592.	Not accepted. They were moved to the Bibliography because they aren't used normatively in the text.
22	Denizhan GUL	NonVoter		2 API 580	Editorial	The title has been changed	Elements of a Risk based inspection program	accepted
25	Darryl Godfrey	Negative		2 P1	Editorial	API Recommended Practice 580 incorrectly named API Recommended Practice 580, Risk-Based Inspection rather than Elements of a Risk-Based Inspection Program	Check the naming of all listed documents to ensure they are correct.	accepted

28	Darryl Godfrey	Negative		3	Entire Section	Technical	Changes to terms, definitions, acronyms and Abbreviations have been made to items that are not owned by API 510 which is against the protocol defined by API Bulletin 590 which only permits changes to items owned by the source document. Examples include corrosion under insulation and ECSCC but there are most likely others. Similar to API 570 identify with an asterisk items where API 510 is the source document add Note	Check against 590 terms & Definitions as unless API RP 510 is the source document then changes are not possible. Add NOTE Definitions for terms delineated with asterisks are maintained by API 510. If another document plans to reference, see API Bulletin 590 for reference. Scorecard changes to terms, definitions, acronyms and abbreviations for consideration in updates to the source documents.	Not accepted. API 590 was withdrawn. It is a SCIMI internal document only.
30	Rick Nichols	Affirmative With Comment		3.1	All	Editorial	What happened to the spacing?	include a space between terms and definitions	noted. To be addressed by the API editors ME: after balloting settles
29	Leslie Ward	Negative		3.1	1st	General	Curious why we changed the word "code" to "document" here, but continue to use the word "code" or "inspection code" when referencing this document? Though, I understand that the first sentence to the section about Terms and Definitions should be stated with this specific phrasing. Section 6.6.1 uses "this document."	Consistently use the terms "this document, this code, or this inspection code."	Not accepted. This sentence is mandated by the style guide.
60	Rick Nichols	Affirmative With Comment	3.1.5		second sentence	Editorial	I thought we were NOT using more than one sentence in a definition	Move "Whenever the...situation." to Note 1	No restriction in the 2025 style guide (Annex E). However, 2nd sentence is elaborative, so NOTE made.
61	Brian Boss	Negative	3.1.5		3.1.5	Technical	Authorized Inspection Agency - Why strike out definition?	leave as original wording	Accepted add Authorized inspection agency back in
62	Brian Boss	Negative	3.1.5		3.1.5	Technical	Authorized pressure vessel inspector - keep the "including annex B"	leave as original wording	Not accepted. Can't mandate the use of ICP.
63	Mark Geisenhof	Negative	3.1.5		all	General	suggest keeping Authorized Inspection Agency in definitions as opposed to moving to 4.4. Authorized Pressure Vessel Inspector still remains in definitions and the two definitions should remain	Add 3.5 back to definitions	Accepted add Authorized inspection agency back in
73	David Wang	Negative	3.1.6		First sentence	Technical	Change to "an examination method or a variety of examination methods". Can be a single method, not necessarily always a variety of methods. No need to have "and techniques". Redundant.	A designated area on pressure vessels where periodic examinations are conducted to directly assess and monitor the condition of the vessel using an examination method or a variety of examination methods based on damage mechanism susceptibility.	accepted

74	Rick Nichols	AffirmativeWithComment	3.1.6	Multiple	Editorial	Notes are not numbered, have different fonts, and different spacing	Revise to API Style Manual	Accepted in Principle. Notes are to be numbered if more than 1. Examples demonstrated in the style guide show subtext (e.g., notes, examples) in a 1 smaller font than the main text. Spacing and indentions, et.al. will be addressed before publishing.
75	Terry Blue	Negative	3.1.6	Notes	General	Annex E of the style guide states that definitions should not include requirements or elaborative text; however, several of the accompanying notes appear to include content that goes beyond that intent.	Coordinate with API to align on the appropriate treatment of notes in accordance with the 2025 updated style guide.	Noted see API note
76	Abhishek Gupta	NonVoter	3.1.6	Definition	Technical	ERROR	Change "know internal damage" to "know internal/ external under insulation damage"	Accepted
77	Abhishek Gupta	NonVoter	3.1.6	Title	Technical	ERROR	"required thickness" should it be changed to "minimum required thickness"	Accepted in principle: cannot include the term in the definition.
78	Abhishek Gupta	NonVoter	3.1.6	Definition	Editorial	"pressure vessel based on the appropriate applicable construction code"- can remove "appropriate"	can remove "appropriate"	Accepted
87	Abhishek Gupta	NonVoter	3.1.8 in-service	Definition	Editorial	"Pressure vessels that are idle in an operating siteand vessels that are not currently in operation because of a process outage are still considered in-service pressurevessels." This sentence is included as Note 2. Can be removed from here.	Remove "Pressure vessels that are idle in an operating siteand vessels that are not currently in operation because of a process outage are still considered in-service pressurevessels." from main body of the definition	Accepted
90	Christopher Archie	Negative	3.1.9	3.1.9	Technical	Design minimum thickness in pressure vessel design calculation report includes design corrosion allowance. Change "over design minimum thickness" to "over required thickness".	Additional material thickness available, over required thickness, to allow for metal loss during the service life of the vessel component.	Accepted in principle: using the term " required thickness" defined in this section
91	Leslie Ward	Negative	3.1.9	1st	Editorial	Corrosion allowance. The wording of the new phrase "over design minimum thickness" is awkward. Suggest using "in addition to the design minimum thickness."	The definition should read "Additional material thickness available, in addition to the design minimum thickness, to allow for metal loss during the service life of the vessel component."	Accepted in principle: do not want to use "addition" twice in the same sentence.
92	Christopher Archie	Negative	3.1.9	3.1.9	Technical	Design minimum thickness in pressure vessel design calculation report includes design corrosion allowance. Change "over design minimum thickness" to "over required thickness".	Additional material thickness available, over required thickness, to allow for metal loss during the service life of the vessel component.	Accepted in principle: using the term " required thickness" defined in this section

33	Darryl Godfrey	Negative	3.1.13	P1	Technical	Definition not owned by API 510 but owned by API 583. ECSCC is defined as CUI per API 583 hence cannot be deleted.	Return to original definition.	Not accepted
34	Darryl Godfrey	Negative	3.1.15	P1	Technical	Revise definition of damage mechanism to include PRDs and damage mechanisms that affect PRD performance. Include reference to API RP 576.	revise definition3.1.15damage mechanismAny type of deterioration encountered in the refining and chemical process industry that can result in flaws/defects that can affect the integrity of vessels (e.g., corrosion, cracking, erosion, dents, and other mechanical, physical, or chemical impacts) or the performance of PRDs. See API RP 571 for a comprehensive list and description of damage mechanisms. See API RP 576 for possible causes of improper performance of PRDs.	Accepted
35	David Wang	Negative	3.1.17	The entire definition, including note.	Technical	The current wording saying that defects designates rejectability is too broad, not recognizing the option of further evaluation using FFS for in-service vessels.	Defect: A discontinuity or discontinuities that, by nature or accumulated effect, render a part, assembly, complete vessel, or product unable to meet the requirements of the applicable construction code.Note: A defect is rejectable per the applicable construction code; however, for in-service equipment, continued operation may be permitted based on a fitness-for-service evaluation with appropriate risk mitigation.	Accepted
36	Darryl Godfrey	Negative	3.1.19	P1	Technical	deficiency definition not well defined needs more explanation3.1.19deficiencyAny condition of covered process equipment that is outside acceptable limits defined by process safety information (PSI).What are acceptable limits defined by PSI for Process Equipment.Process Equipment PSI includesConstruction materialsPiping and instrument diagrams (P&ID's)Electrical classificationRelief system design and design basisVentilation system designDesign codes and standards employedMaterial and energy balances (for processes built after May 26, 1992)Safety systems (e.g. interlocks, detection, or suppression systems)Design limits?P&ID errors?Incorrect design codes and standards?	Improve definition with better examples of what limits are defined as PSI for Process Equipment, Tmin is mentioned in the body of the document but no other limits. Delete definition if it cannot be defined unambiguously with examples and delete new section 6.10.	Noted, ambiguous comment
37	Abhishek Gupta	NonVoter	3.1.19 deficiency	Definition	Editorial	ERROR	replace "process equipment" with "pressure equipment"	accepted

38	Darryl Godfrey	Negative	3.1.20	P1	Technical	Definition owned by API 5763.1.10design pressureThe pressure, together with the design temperature, used to determine the minimum permissible thickness or physical characteristic of each vessel or piping component as determined by the appropriate design rules.NOTE 1 The design pressure is selected by the owner-operator to provide a suitable margin above the most severe pressure expected during normal operation at a coincident temperature.NOTE 2 This pressure may be used in place of the MAWP in all cases where the MAWP has not been established.NOTE 3 The design pressure is equal to or less than the MAWP.	Use API 576 definition.	Accepted
39	Leslie Ward	Negative	3.1.23	1st	Editorial	Due Date. Suggest changing the term retirement to remaining in the second sentence of the definition of Due Date. Consider changing the second use of retirement in the second sentence to end of life.The date may be established by rule-based inspection methodologies (e.g., fixed intervals, remaining half-life interval, end of life date), risk-based methodologies (e.g., RBI target date), FFS analysis results, owner-operator inspection agency practices/procedures/guidelines, or any combination thereof.	Change the second sentence to state:"The date may be established by rule-based inspection methodologies (e.g., fixed intervals, remaining half-life interval, end of life date), risk-based methodologies (e.g., RBI target date), FFS analysis results, owner-operator inspection agency practices/procedures/guidelines, or any combination thereof."	Accepted
41	Scott Sinclair	Negative	3.1.28	1st sentence	Technical	Many references to CUI throughout this document only reference CUI and not ECSCC. Should state in this definition that ECSCC is a type of CUI.	Add an additional sentence stating "ECSCC is classified as a type of CUI within this standard."	Not accepted
42	Darryl Godfrey	Negative	3.1.28	P1	Technical	Definition owned by API 5833.1.20external chloride stress corrosion crackingECSCCSurface initiated cracking in austenitic and duplex stainless steels and some nickel base alloys under the combined action of tensile stress, temperature, and an aqueous chloride environment.	Definition is consistent with API 583 but not owned by API 510See corrosion under insulation definition which also includes ECSCC	Accepted in principle need to match API 583 This DOES match 583
40	Michael Schmidt	NonVoter	3.1.27	Note 1 & Note 2	Technical	Consider replacing external inspection wording with external visual for consistency with the defined term.	Consider revising as follows: "Note 1: The external visual inspection may..."	accepted
43	Terry Blue	Negative	3.1.30	Number	Editorial	3.1.30 is between 3.1.39 and 3.1.41 so it should be updated to 3.1.40.	Correct numbering.	accepted
44	Leslie Ward	Negative	3.1.30	1st	Editorial	3.1.30 Inspection should be 3.1.40.	Change the numbering to 3.1.40.	accepted
45	Ibrahim Kodssi	NonVoter	3.1.31	3.1.31	Editorial	replace uniform with uniformly	uniformly	accepted in principle
27	Denizhan GUL	NonVoter		3 3.1.33	General	"tests" can also be included for hold point definition.	 Until the required inspection, NDE or Test performed	accepted

46	David Wang	Negative	3.1.33	Definition	Technical	Add "and the result has been formally accepted (signed off) by the designated authority".	A point in the repair or alteration process beyond which work may not proceed until the required inspection or NDE has been performed and the result has been formally accepted (signed off) by the designated authority.	accepted
47	David Wang	Negative	3.1.35	Definition	Technical	Presumed that the term "applicable acceptance criteria" in the sentence here is not necessarily limited to acceptance criteria specified in applicable construction code, since 510 is for in-service pressure vessels. However, while "applicable construction code" is defined in the document., the term "applicable acceptance criteria" is not. It should be defined to be clear what it refers to.	Add a definition for "applicable acceptance criteria", or spell out what it refers to in the sentence.	Accepted in principle: Alternatively, we could revise the definition for imperfection as follows: "Flaws or other discontinuities noted during inspection or examination that may or may not exceed the acceptance criteria specified by the applicable code, standard, specification, or engineering evaluation
48	Ray Konet	Negative	3.1.37	1s	Technical	Deleting reference to API QUTE and equivalents, provides no guidance to what is "industry qualified".	Keep existing words.	noted API has directed that we should not refer to API programs
49	David Wang	Negative	3.1.38	Note 1	Editorial	The 2nd sentence repeats info already provided in the first sentence of the definition. Delete this redundant statement.	Delete the 2nd sentence in Note 1: "The life cycle of a pressure vessel that begins after initially commissioning the vessel into active service and ends at the decommissioning."	accepted
50	David Wang	Negative	3.1.38	Note 2	Editorial	This note repeats info already provided in the second sentence of the definition. Delete this redundant note.	Delete Note 2.	ME: Accepted in principle, removed 2nd sentence in definition instead.
51	Edward Sanchez	Negative	3.1.38	Note 1	Editorial	The word "that" can be removed from the added content.	Remove the word "that" from the added content.	accepted
52	Leslie Ward	Negative	3.1.40	2nd	Editorial	3.1.30 Inspection should be 3.1.40. Why do we only list three types of inspections in the definition, but include six items in Section 5.5.1? a) internal inspection, b) on-stream inspection, c) external inspection, d) thickness examination, e) CUI/CUF inspection, f) operator surveillance. "The external, internal, or on-stream evaluation (or any combination of the three) of the condition of a vessel conducted by the authorized inspector or his/her designee in accordance with this code."	Change the definition to state: "The external, internal, on-stream, CUI/CUF/ECSCC, or thickness examination evaluation (or any combination of the five) of the condition of a vessel conducted by the authorized inspector or his/her designee in accordance with this code."	accepted in principle
53	Darryl Godfrey	Negative	3.1.42	P1	Technical	Include 'testing' in inspection plan definition to make consistent with section 5.1 content that includes have testing requirements included in inspection plans. 3.1.42 inspection plan A strategy defining how and when a pressure vessel or PRD will be inspected, tested, examined, repaired, and/or maintained (see 5.1).	Update definition 3.1.42 inspection plan A strategy defining how and when a pressure vessel or PRD will be inspected, tested, examined, repaired, and/or maintained (see 5.1).	accepted
54	Ibrahim Kodssi	NonVoter	3.1.45	3.1.45	Technical	internal inspection includes visual and/or NDE	remove "visual"	accepted

55	Christopher Archie	Negative	3.1.45	3.1.45	Editorial	Change "internal visual inspection" to "internal inspection". Visual is used in the definition and the definition includes NDE.	Change "internal visual inspection" to "internal inspection".	accepted
56	Christopher Archie	Negative	3.1.45	3.1.45	Editorial	Change "internal visual inspection" to "internal inspection". Visual is used in the definition and the definition includes NDE.	Change "internal visual inspection" to "internal inspection".	Noted. Duplicate comment.
57	Christopher Archie	Negative	3.1.46	3.1.46	Technical	Noncontinuous should be mentioned as well. Throughout this document, both intermittent/noncontinuous and noncontinuous/intermittent is used. This should be standardized to one definition.	Change to "intermittent/noncontinuous"	Accepted. See SK 384
58	Christopher Archie	Negative	3.1.46	3.1.46	Technical	Noncontinuous should be mentioned as well. Throughout this document, both intermittent/noncontinuous and noncontinuous/intermittent is used. This should be standardized to one definition.	Change to "intermittent/noncontinuous"	Noted. Duplicate comment.
59	Darryl Godfrey	Negative	3.1.46	P1	Technical	intermittent service definition is owned by API 570 and definitions need to be aligned. 3.1.46 intermittent Operational condition where equipment, such as pressure vessel, or components, such as exchanger channel head, is not in constant service but experiences periodic or cyclic operation. Note: This can include equipment that is taken out of service for extended periods, undergoes cycling between pressurized and depressurized states, or operates on a batch or seasonal basis rather than continuous, steady state operation."	Update definition to make consistent with API 570 source definition intermittent service The condition of a pressure vessel whereby it is not in continuous operating service (i.e. it operates at regular or irregular intervals rather than continuously). NOTE Occasional turnarounds or other infrequent maintenance outages in an otherwise continuous process service does not constitute intermittent service.	accepted in principle, incorporated NOTE
64	David Wang	Negative	3.1.50	2nd sentence	Technical	This is not a good example since changing inspection personnel normally does not automatically trigger an MOC. The trigger for the MOC in this example here is really changing an approved ITP. Revise the example to make it clear, or delete the example.	Delete the second sentence.	MOC: I disagree with the context in which he is reading this. But this sentence is elaborative and should be a NOTE - RRS
65	Cynthia Landry	Affirmative With Comment	3.1.54	Definitions	Technical	Delete Minimum Pressurization Temperature, only used once in the document with no additional explanation that helps the user differentiate it from minimum design metal temperature.	Delete Minimum Pressurization Temperature and refer to MDMT/MAT	Delete the definition and incorporate into the body of the document
66	Christopher Archie	Negative	3.1.54	3.1.54	Editorial	Delete or combine it together with 3.1.53. MAT is used in lieu of MPT in API 579. MPT is also not used throughout this document.	Delete or combine with 3.1.53	Accepted in principle, See SK 65
67	Christopher Archie	Negative	3.1.54	3.1.54	Editorial	Delete or combine it together with 3.1.53. MAT is used in lieu of MPT in API 579. MPT is also not used throughout this document.	Delete or combine with 3.1.53	Noted. Duplicate comment.

68	Michael Schmidt	NonVoter	3.1.57	Insert a new term at this location	Technical	Please consider adding a new definition for the term "Non-intrusive Inspection"	Non-Intrusive Inspection - An inspection completed on a pressure vessel for internal damage mechanisms using non-intrusive NDE techniques.	noted related to SK 69 and 72 for definition of OSI or Non intrusive. No change for next ballot,
69	Leslie Ward	Negative	3.1.59	1st	Technical	On-stream. A condition in which a pressure vessel has not been prepared for an internal inspection (see "on-stream inspection"). I always thought that an on-stream inspection was intended to be performed while the pressure vessel was pressurized and in operation. In section 5.5.3.3, which discusses on-stream in lieu of an internal inspection, the inspection may be conducted either while the vessel is depressurized or pressured. Consider adding more clarification to the definition to clarify what the intention is for on-stream to be. See additional information provided.	Update the definition pending the determination of what we want on-stream to mean.	Noted: no changes to next ballot. Both comments to be added to scorecard to be discussed at SCIMI meeting.
70	Leslie Ward	Negative	3.1.59	1st	Technical	More info on on-stream: Evaluation of equipment integrity during operation On-stream inspection (OSI) refers to the evaluation of equipment integrity during operation, particularly in the oil and gas industry. It involves using advanced techniques such as radiographic testing to detect wall thinning, corrosion, and other defects without interrupting production. Common methods include projection and tangential techniques, which capture images of both pipe walls or focus on one wall for higher resolution. OSI is crucial for ensuring the reliability of equipment and preventing unexpected failures, optimizing performance and reducing downtime. https://onstream-pipeline.com/https://www.bakerhughes.com/waygate-technologies/blog/how-do-i-carry-out-onstream-inspection https://www.petrosync.com/blog/on-stream-inspection/ See additional information provided.	Update the definition pending the determination of what we want on-stream to mean.	Noted. Continuation of SK 69
71	Leslie Ward	Negative	3.1.59	1st	Technical	More info on on-stream: Baker Hughes: Onstream Inspection Enables Testing Without Shutdown: Onstream (or in-service) inspection allows for the evaluation of pipes, valves, and vessels during operation, using radiographic techniques to detect wall thinning, corrosion, and other defects without interrupting production Petrosync: On-Stream Inspection (OSI) evaluates equipment integrity during operation to ensure the pressure boundary's suitability for continued service. It assesses factors like corrosion, defects, and structural integrity, enabling timely maintenance to prevent unexpected failures. OSI optimizes equipment performance and reduces downtime.	Update the definition pending the determination of what we want on-stream to mean.	Noted. Continuation of SK 69

72	David Wang	Negative	3.1.59	Definition	General	The "on-stream" and "on-stream inspection" definitions in 3.1.59 and 3.1.60 are old-school, originated in the days before RBI, when on-stream inspection was the opposite of internal inspection, instead of the non-intrusive inspection vs intrusive inspection commonly used today under RBI. We should consider updating the terms, switch them to the new terms (i.e. non-intrusive inspection and intrusive inspection) and put the old terms as notes under the definitions of the new terms for reference, instead of continuing use of the old terms that don't fit well with RBI. Since on-stream inspection is used throughout this document, suggest forming a TG to review and update all of them where needed.	Replace "on-stream inspection" with "non-intrusive inspection".	Accepted. Note added to the definition for the next ballot per D. Wang email.
79	Edward Sanchez	Negative	3.1.60	S1	Editorial	Change the added word "know" to "known."	Change the added word "know" to "known."	accepted
80	Ibrahim Kodssi	NonVoter	3.1.60	3.1.60	Editorial	"know" should be replaced with "known"	replace with "known"	accepted
81	David Wang	Negative	3.1.60	Definition	General	The "on-stream" and "on-stream inspection" definitions in 3.1.59 and 3.1.60 are old-school, originated in the days before RBI, when on-stream inspection was the opposite of internal inspection, instead of the non-intrusive inspection vs intrusive inspection commonly used today under RBI. We should consider updating the terms, switch them to the new terms (i.e. non-intrusive inspection and intrusive inspection) and put the old terms as notes under the definitions of the new terms for reference, instead of continuing use of the old terms that don't fit well with RBI. Since on-stream inspection is used throughout this document, suggest forming a TG to review and update all of them where needed.	Replace "on-stream inspection" with "non-intrusive inspection".	Error: no definition change provided that a statement could be added in the document to clarify that the guidance for on-stream inspection pertains only to inspection programs not based on RBI (e.g., time-based or condition-based inspection programs). For RBI-based inspection programs, inspections may instead be classified as intrusive or nonintrusive, rather than internal vs. on-stream. 9/17 DJR need to add in the onstream section (5.5.3.1) that Onstream is typically based on a time based frequency (potentially add) outside of an RBI methodology.
82	Michael Schmidt	NonVoter	3.1.60	1st paragraph	Technical	Add clarification that this inspection method can be completed to assess both internal damage mechanisms using non-intrusive inspection methods and external damage mechanisms	Consider revising as follows: "An inspection performed from the outside of a pressure vessel while it is on-stream using NDE procedures to evaluate or monitor the presence of credible or known internal damage mechanisms and establish the suitability of the pressure boundary for continued operation."	Accepted in principle
83	Ibrahim Kodssi	NonVoter	3.1.61	3.1.61	Technical	remove "still in operation" to avoid contradiction with the definition 3.1.38 with its note 2.	remove "still in operation"	Rejected No change may draw negative
84	David Wang	Negative	3.1.66	1st sentence	Editorial	Replace "That" with "The" as the beginning of the sentence.	The portion of the pressure vessel that contains ...	Accepted

85	Leslie Ward	Negative	3.1.68	1st	Editorial	Consider moving "or by any combination thereof" to the end of the second sentence in the definition of pressure vessel. "This pressure may be imposed by the application of heat from a direct or indirect source, or by any combination thereof or by any other source such as a pump or turbine."	Change the second sentence to state: "This pressure may be imposed by the application of heat from a direct or indirect source, or by any other source such as a pump or turbine, or by any combination thereof."	Accepted
31	Christopher Archie	Negative	3.1	3.1.74	Editorial	Note 1 under the definition of repair contains two shalls. I believe API didn't include shalls in definitions or notes. Disregard this comment if I'm mistaken.	Suggest moving this statement to section 8.1 Repairs and Alterations	remove the shalls from the definition per API guidance. we can work the note into 8.1.1. Essentially move the 2nd sentence on to 8.1.1.
32	Christopher Archie	Negative	3.1	3.1.74	Editorial	Note 1 under the definition of repair contains two shalls. I believe API didn't include shalls in definitions or notes. Disregard this comment if I'm mistaken.	Suggest moving this statement to section 8.1 Repairs and Alterations	Noted. Duplicate comment.
86	Ibrahim Kodssi	NonVoter	3.1.78	3.1.78	Technical	Use the definition from API 580 to promote consistency within the API organization	Use the definition from API 580 to promote consistency within the API organization	Accepted
94	Mark Geisenhof	Negative	3.1.78	all	General	Suggest leaving temper embrittlement in definitions. It is used two places in the document	Do not delete temper embrittlement from definitions	Accepted
88	Ibrahim Kodssi	NonVoter	3.1.83	Note 1	Editorial	Remove Note 1 since it is already covered by 3.1.67	Remove Note 1 since it is already covered by 3.1.67	Accepted
89	Darryl Godfrey	Negative	3.1.83	P1	Technical	Revise testing definition to include performance testing such as insitu or benchtesting used for PRDs 3.1.83testingWithin this document, testing generally refers to either pressure, chemical testing or mechanical testing,Note 1: Pressure testing can be whether performed hydrostatically, pneumatically, or a combination hydrostatic/pneumatic., orNote 2: Mechanical testing can be used to determine such data as material hardness, strength, and notch toughness. Note 3 Testing does not refer to examination using NDE techniques such as liquid penetrant examination (PT), magnetic particle examination (MT), ultrasonic examination (UT), radiographic examination (RT), etc.etc.	Update definition of 'testing' to include performance testing3.1.83testingWithin this document, testing generally refers to either pressure, performance testing, chemical testing or mechanical testing,Note 1: Pressure testing can be whether performed hydrostatically, pneumatically, or a combination hydrostatic/pneumatic., orNote 2: Mechanical testing can be used to determine such data as material hardness, strength, and notch toughness. Note 3 Performance testing of PRDs can be used to provide an acceptable level of confidence that their performance meets the requirements for a given installation.Note 4 Testing does not refer to examination using NDE techniques such as liquid penetrant examination (PT), magnetic particle examination (MT), ultrasonic examination (UT), radiographic examination (RT), etc.etc.	Accepted

93	Leslie Ward	Negative	3.1.xx	1st	Technical	Consider adding the definition for Remote Piloted Aircraft System to Section 3.1. Explain the differences between drone, UAV, UAS, RPA, or RPAS. https://altigator.com/en/drone-uav-uas-rpa-or-rpas/Unmanned Aircraft System (UAS)RPAS in Aviation In the US, RPAS is commonly referred to as Unmanned Aircraft System (UAS). This term is used by the Federal Aviation Administration (FAA) and the European Aviation Safety Agency (EASA). The FAA and EASA use the terms UAS and RPAS interchangeably, and the FAA provides a complete definition and explanation of this choice. The FAA and EASA also use the terms Unmanned Aircraft (UA) or Remotely Piloted Aircraft (RPA) to describe the aircraft itself, whereas the term Unmanned Aircraft System (UAS) is generally used to describe the entire operating equipment, including the aircraft, the control station from where the aircraft is operated, and the wireless data link.	Add the following definition. "Remote Piloted Aircraft System (RPAS) is a regulated system of drones controlled by a licensed remote pilot. It is generally used to describe the entire operating equipment, including the aircraft, the control station from where the aircraft is operated, and the wireless data link."An alternate definition could be: "A set of configurable elements consisting of a remotely-piloted aircraft, its associated remote pilot station(s), the required command and control links and any other system elements as may be required, at any point during flight operation."	noted
95	Leslie Ward	Negative	3.2	1st	Technical	Add RPAS to Section 3.2 https://skybrary.aero/articles/introduction-remotely-piloted-aircraft-systems-rpas RPAS stands for Remotely Piloted Aircraft System, a regulated system of drones controlled by a licensed remote pilot.	RPAS - Remote Piloted Aircraft System	Accepted
97	Darryl Godfrey	Negative	3.2	P1	Technical	The inclusion of PRV is not needed and adds nothing. PRDs (refer API 576) include PRVs, a non-reclosing PRD, or a vacuum-relief valve. Common examples include direct spring loaded PRVs, pilot-operated PRVs, rupture disks, buckling pin devices, and weight-loaded devices. The term "pressure-relief valve" is generic in nature, and these devices can be classified as a safety valve, relief valve, or a safety relief valve.	Remove PRV acronym and where it is used within the document.	Accepted
96	Rick Nichols	Affirmative With Comment	3.2	All	Editorial	Spacing!	Add a space after every Acronym	noted. To be addressed by the API editors.
111	Brian Boss	Negative	4.1.1	all	Technical	Unclear why changing organizational responsibilities and why definition of alteration is included here	leave as original wording	Accepted Revert to original
108	Leslie Ward	Negative	4.1.1	1st	Editorial	Consider changing pressure relief device in the first sentence to pressure-relieving device. This will make this phrase consistently used in this document and API RP 576.	Change the first sentence to state: "An owner-operator of pressure vessels shall exercise control of the vessel and pressure-relieving device inspection program, inspection frequencies, and maintenance."	Accepted

98	Darryl Godfrey	Negative	4.1.1	P1S2	Technical	In a prescriptive code, language like this is problematic because it combines advisory wording and subjective concepts ("should," "reasonably accurate," "timely") with mandatory obligations, creating requirements that cannot be objectively verified or consistently enforced. It introduces outcome based expectations without defined criteria, leading to inconsistent interpretation, audit uncertainty, and potential after the fact enforcement, while adding compliance and legal exposure without improving clarity or safety.	Delete second sentence.	Accepted Revert to original
99	Grady Hatton	Negative	4.1.1	1st Para	Technical	Wording such as, "reasonably accurate and timely assessment", cannot be quantified with any consistency.	Basis of Negative - The wording cannot be appropriately measured with any certainty. The program should provide accurate assessments to determine any changes in the condition of the pressure equipment. The owner-operators shall respond to any inspection the require corrective actions.	Accepted Revert to original
104	Adam Keown	Negative	4.1.1	1 new sentences	Technical	The new sentences provide confusing direction. Some of it is very wishy-washy, e.g. "reasonably accurate and timely", "could compromise", "safe operation". Other parts of this appear to be new requirements for the owner-operator. "shall respond to any inspection results that require corrective actions".	Basis for Negative - Eliminate the new text. I believe the requirements for an owner-operator are covered in the existing text, especially in this "General" section	Accepted Revert to original
106	Terry Blue	Negative	4.1.1	1st para new sentence	Technical	The added paragraph text uses inappropriate words such as "reasonably accurate", "timely assessment", and "could compromise" and "any inspection" and "ensure". In a prescriptive code, language like this is problematic because it combines advisory wording and subjective concepts ("should," "reasonably accurate," "timely") with mandatory obligations, creating requirements that cannot be objectively verified or consistently enforced. It introduces outcome based expectations without defined criteria, leading to inconsistent interpretation, audit uncertainty, and potential after the fact enforcement, while adding compliance and legal exposure without improving clarity or safety.	Basis of Negative - The added paragraph relies on subjective and non verifiable language such as "reasonably accurate," "timely," "could compromise," "any inspection," and "ensure." In a prescriptive code, this type of wording is problematic because it combines advisory language with mandatory obligations, resulting in requirements that cannot be objectively demonstrated or consistently enforced. It introduces outcome based expectations without defined criteria, which can lead to inconsistent interpretation, audit uncertainty, and retrospective enforcement, while increasing compliance and legal exposure without providing additional clarity or safety benefit.	Accepted Revert to original
107	Terry Blue	Negative	4.1.1	2nd para new shall	Technical	The revised "is responsible" to "shall establish" is clunky and unnecessary.	Basis of Negative - Revert back to original.	Accepted Revert to original
115	Ken Min	Negative	4.1.1	1st Para	Technical	2nd sentence "The program should..." does not add valuable context to this section. It can create confusion with terms like 'reasonably timely'. Recommend removal.	Remove the 2nd sentence.	Accepted Revert to original

101	William Martin	Negative	4.1.1	1	Technical	Not all recommendations for corrective action are to address deficiencies. Requiring every recommendation to be acted is not necessary.	Reason for negative vote.	Accepted Revert to original
109	Leslie Ward	Negative	4.1.1	1st	Editorial	Consider changing owner-operators to owner-operator in the third sentence. I don't think it needs to be plural.	Change the third sentence to state: "The owner-operator shall respond to any inspection results that require corrective actions to ensure the continued safe operation of pressure vessels."	Accepted
116	Ken Min	Negative	4.1.1	1st Para	Editorial	3rd sentence "The owner-operator shall respond..." should be moved to section 6.10 (recommendations section). 'Organization Responsibilities' section is not the appropriate section to impose this new 'Shall' requirement.	Move 3rd sentence to section 6.10, or consider deleting.	Accepted in principle
26	Edward Sanchez	Negative	4.1.1	P2, S1	Editorial	"The owner-operator shall establish for the function of an authorized inspection agency..." sounds unnecessarily clumsy.	Reword to "The owner-operator shall establish an authorized inspection agency..."	Accepted
100	Christopher Archie	Negative	4.1.1	Second paragraph	Editorial	The first sentence in the second paragraph reads odd to me. "The owner-operator shall establish for the function of an authorized inspection agency in accordance with the provisions of this code."	Remove the word "for" or "for the function of" from the sentence.	Accepted Revert to original
102	Christopher Archie	Negative	4.1.1	Second paragraph	Editorial	The first sentence in the second paragraph reads odd to me. "The owner-operator shall establish for the function of an authorized inspection agency in accordance with the provisions of this code."	Remove the word "for" or "for the function of" from the sentence.	Noted. Duplicate comment.
103	Adam Keown	Negative	4.1.1	2	Technical	Appears to be forcing a "shall" into the "is responsible" wording	Basis for Negative - Use original wording	Accepted Revert to original
110	Leslie Ward	Negative	4.1.1	2nd	Technical	I'm not sure what we are trying to say in the first sentence of the 2nd paragraph. Is the intention "The owner-operator is responsible for authorized inspection agency duties under this code?" If this is the intention, then change the first sentence to state: "The owner-operator shall be responsible for authorized inspection agency duties under this code."	Change the first sentence to state: "The owner-operator shall be responsible for authorized inspection agency duties under this code."	Accepted Revert to original
112	Mark Geisenhof	Negative	4.1.1	2nd paragraph	General	The new words in the first sentence "shall establish" are unnecessary and do not flow or make sense in the sentence. Revert to "is responsible"	Change back to "is responsible"	Accepted Revert to original
118	Abhishek Gupta	NonVoter	4.1.1 General	Para 2, Line 1	Editorial	"shall establish for the function"- remove for	"shall establish for the function"- remove for	Accepted Revert to original
105	Adam Keown	Negative	4.1.1	2 new text at end	Technical	These examples are covered elsewhere in the document and don't need to be included in this "General" section. If any of this is new content, it should be in section 8 Repairs, Alterations, and Rerating of Pressure Vessels and Pressure-Relieving Devices.	Eliminate the new text.	Accepted - new text eliminated

113	Mark Geisenhof	Negative	4.1.1	2nd paragraph	General	Move new sentence to section 8 for repairs and alterations- The following are examples which should not be considered alterations: any comparable or duplicate replacement; the addition of any reinforced nozzle less than or equal to the size of existing reinforced nozzles; and the addition of nozzles not requiring reinforcement.	Move to 8.1	Accepted in principle: revert to original
114	Denizhan GUL	NonVoter	4.1.1	Second paragraph	Editorial	I think alteration examples would be more appropriate in the Terms and Definitions section. Including them under section 4.1, Owner/Operator Responsibilities, seems slightly off-topic.		Accepted in principle: revert to original
117	Ken Min	Negative	4.1.1	2nd Para	Editorial	Last sentence "The following are..." does not belong in this section. This section is about organizations.	Move to either definitions, or Section 8.	Accepted in principle: revert to original
120	Edward Sanchez	Negative	4.1.2	P1, S1	Editorial	Seems to be a run-on sentence.	Put a period between "regulations" and "however."	Accepted
121	Adam Keown	Negative	4.1.2		1 Technical	Appears to be forcing a "shall" into the "is responsible" wording	Use original wording	Accepted revert to is responsible
122	Christopher Archie	Negative	4.1.2	First Paragraph	Editorial	The first sentence is long. I suggest breaking it into two shorter sentences between regulations and however.	An owner-operator organization shall for develop, document, implement, execute, and assess pressure vessel/pressure-relieving device inspection systems, inspection/repair systems, and procedures that meet the requirements of this inspection code as well as other regulations. However, if the requirements of this code are more stringent than the requirements of the regulation, then the requirements of this code should govern.	Accepted in principle
123	Christopher Archie	Negative	4.1.2	First Paragraph	Editorial	The first sentence is long. I suggest breaking it into two shorter sentences between regulations and however.	An owner-operator organization shall for develop, document, implement, execute, and assess pressure vessel/pressure-relieving device inspection systems, inspection/repair systems, and procedures that meet the requirements of this inspection code as well as other regulations. However, if the requirements of this code are more stringent than the requirements of the regulation, then the requirements of this code should govern.	Noted. Duplicate comment.
124	David Wang	Negative	4.1.2	1st para, 1st sentence	Editorial	Make "however" in the middle of the 3rd line the start of the sentence, or change the comma after regulations to a semicolon. The former is better since it breaks one very long sentence to two more readable sentences.	... requirements of this inspection code as well as other regulations. However, if the requirements ...	Accepted in principle

127	Brian Boss	Negative	4.1.2	all	Technical	unclear why changing this section at all.	leave as original wording	Accepted revert to is responsible
128	Michael Schmidt	NonVoter	4.1.2	1st paragraph	General	The first sentence was changed to a shall statement with additional requirements resulting in a run-on sentence. The second portion of the sentence contains a should statement in an otherwise shall sentence	Revise to two sentences, the second sentence consider revising the should to shall: "...as well as other regulations. However, if the requirements of this code are more stringent than the requirements of the regulation, then the requirements of this code shall govern."	Accepted in principle
129	Robert Sladek	NonVoter	4.1.2	P1, S1	Editorial	Break into 2 sentences. Remove "however".	"... as well as other regulations. If the requirements..."	Accepted in principle
125	David Wang	Negative	4.1.2	1st para, 2nd sentence	Technical	Change "will" to "shall".	These systems and procedures shall be contained and maintained ...	Accepted
130	Robert Sladek	NonVoter	4.1.2	P1, S2	Technical	The use of "will" may be construed as a nested "shall"	"These systems and procedures SHALL be contained..."	Accepted
119	Terry Blue	Negative	4.1.2	Bulleted List	General	Annex G of the style guide states that requirements should stand alone and be separately numbered. This pattern appears to be present in Sections 4.1.2, 5.1.2.2, 5.1.3, 6.6.2.1, 6.7.3, 7.8.2, and 8.2.1.	Determine how this bulleted list should be structured, including whether it should be led by a single "shall" or "should," and whether the lettered items constitute numbering.	Accepted. Removed 2nd shall since it was unnecessary
126	Denizhan GUL	NonVoter	4.1.2	b	General	I think "QA procedures" is more suitable and broader in scope than "QC."		Accepted
133	Brian Boss	Negative	4.1.3	all	Technical	keep as is	leave as original wording	Noted
134	Leslie Ward	Negative	4.1.3	1st	General	When we state "changes to either the process or to the hardware" in the first sentence of this paragraph, are we talking about the fluid within the pressure vessel or the work process relative to the inspection program? The full sentence states: "The owner-operator shall implement and execute an effective MOC process that reviews and controls changes to either the process or to the hardware." If we are talking about the fluid that moves through the pressure vessel, I suggest that we change the sentence to state: "The owner-operator shall implement and execute an effective MOC process that reviews and controls changes to either the process fluid or to the hardware." There may be other locations in this document that need to be reviewed to change process to proces fluid.	Change the sentence to state: "The owner-operator shall implement and execute an effective MOC process that reviews and controls changes to either the process fluid or to the hardware."	ME: Not Accepted - consider process conditions, "Fluid" is too specific.

135	Leslie Ward	Negative	4.1.3	1st	Technical	Consider adding a new sentence after the first sentence to mention changes to work processes, procedures, or any other documents that are changed and should be part of an MOC Process. This should also address changes in resources.	Consider adding the following sentence as the second sentence to the 1st paragraph. "The owner-operator should include in the MOC process both resource changes and changes to internal standards, procedures, work processes, and other similar documents that support the management of pressure equipment integrity."	Rejected will draw negative
131	Robert Sladek	NonVoter	4.1.3	P2, S1	Technical	Improper use of "may" - should be "can". We should clarify the subject "change". Remove "experience and". Drop "in order" since it adds no value.	"When a change can affect the pressure equipment integrity, the MOC process shall include the appropriate inspection, materials/corrosion, and mechanical engineering expertise to effectively identify pressure equipment design issues and forecast what changes might affect pressure vessel integrity."	Accepted
132	Robert Sladek	NonVoter	4.1.3	P2, S2	Technical	Improper use of "may" - should be "can".	"for changes that CAN affect pressure vessel integrity."	Accepted
136	Leslie Ward	Negative	4.1.3	2nd	Technical	Remove the last sentence of the second paragraph. "Changes to the hardware and the process shall be included in the MOC process to improve its effectiveness in managing pressure equipment integrity." It is redundant to the second sentence of the first paragraph of this section.	Remove: "Changes to the hardware and the process shall be included in the MOC process to improve its effectiveness in managing pressure equipment integrity."	Accepted
137	Leslie Ward	Negative	4.1.4	1st	Technical	Please explain the justification for changing the should to shall in the first sentence of this paragraph. "The owner-operator should implement and maintain an effective program for creating, establishing, and monitoring integrity operating windows." BASIS FOR NEGATIVE.	Do not change the should to shall. Keep the sentence to state: "The owner-operator should implement and maintain an effective program for creating, establishing, and monitoring integrity operating windows."	Accepted: Revert to should voted in SLC
138	Brian Boss	Negative	4.1.4	all	Technical	Keep 'should' statement	leave as original wording	Accepted: Revert to should voted in SLC
139	Mark Geisenhof	Negative	4.1.4	1st & 2nd Para	Technical	Do not agree with changing shoulds to shalls in first and 2nd paragraphs. Keep as shoulds	Leave both shoulds as is in first and 2nd paragraph	Accepted: Revert to should voted in SLC
140	Ken Min	Negative	4.1.4	1st Para	Technical	If IOWs are becoming a 'shall' requirement - then we must allow owner-operators to document that no IOW program is needed. (Basis for negative)	Suggest either changing back to 'should'. OR consider revising to "The owner-operator shall evaluate the need for implementing and maintaining....."	Accepted: Revert to should voted in SLC
145	Grady Hatton	Negative	4.1.4	1st and 2nd para	Technical	While the IOW may be the best approach it is not the only approach.	Basis for Negative - Remove the SHALL and return to SHOULD.	Accepted: Revert to should voted in SLC
146	William Martin	Negative	4.1.4	1	Technical	Keep as a "should" statement. IOWs for specialty chemicals is overly resource intensive. For refining, there are a limited number of processes and chemicals as compared to chemicals production.	Reason for negative vote.	Accepted: Revert to should voted in SLC

148	Tony Poulassic hidis	Negative	4.1.4	4.1.4	Technical	IOW are beneficial but not a mandatory practice to meet program requirements	Replace shall with should.	Accepted: Revert to should voted in SLC
149	Adam Keown	Negative	4.1.4	1 and 2	Technical	I believe that IOW's are wonderful and are a best practice, but I DO NOT believe they are a requirement by code. Making this a shall would be problematic for all owner-operators because of the lack of boundaries for what is required. This opens up a very problematic requirement.	Basis for Negative - Revert to original text	Accepted: Revert to should voted in SLC
150	Gerald Lagarde	Affirmative With Comment	4.1.4	First sentences of Paragraphs 1 and 2	General	Use of the word "shall" makes implementing IOWs a requirement or mandatory. Implementing IOWs should only be a recommendation to help improve an MI program if a company so chooses to implement such.	Change "shall" back to "should".	Accepted
151	Jared Williamson	Negative	4.1.4	1st & 2nd paragraph	General	1st reason for negative vote. Do not agree with changing this first sentence to a "shall" statement. IOWs may not apply to all facilities and some small facilities may not have a formal IOW program. Further, API RP 584 is a "recommended" practice, thus we cannot make this a "shall". This will affect a large number of facilities.	Leave as "should"	Accepted: Revert to should voted in SLC
152	Terry Blue	Negative	4.1.4	1st and 2nd para	Technical	IOW programs are appropriate where operating excursions materially increase damage mechanism severity or accelerate damage rates. Many API 510 services have benign chemistry, low damage rates, or stable operating envelopes where integrity is adequately managed through inspection, remaining life assessment, and standard controls. Requiring IOWs in these cases adds monitoring and response burden without proportional risk reduction and can divert focus from units where operating variability is a primary driver of degradation and loss of containment.	Basis of Negative - Delete both Shall, Return to Shoulds	Accepted: Revert to should voted in SLC
153	Joseph Krynicki	Negative	4.1.4	1st	General	The IOW concept may require extensive sampling that may incur safety challenges. The approach does not consider risk. IOW's are highly complex and difficult to establish with great certainty, and the scope of expectations within the paragraph are not practical in all cases.	Keep as "should" and do not change to "shall"?	Accepted: Revert to should voted in SLC
154	Darryl Godfrey	Negative	4.1.4	P1S1	Technical	BASIS for NEGATIVE IOWs should not be mandated but selectively implemented based on the damage mechanism, risk and effectiveness of the IOW managing the risk.	IOWs not necessary for everything. Revert back to 'should'	Accepted: Revert to should voted in SLC
142	Robert Sladek	NonVoter	4.1.4	P1, S2	Technical	Improper use of "may" - should be "can". Plus, new verbiage is not necessary, just strike the counter to cover all impacts	"IOWs are implemented to avoid process parameter exceedances that CAN impact pressure equipment integrity."	Accepted
143	Robert Sladek	NonVoter	4.1.4	All	Technical	Basis for NEGATIVE (if I could vote): Is the industry ready for these "shalls"? Making IOWs a requirement places an additional regulatory burden on Operators. I believe many Operators have yet to formalize an IOW monitoring program.	Revert back to "should"	Accepted revert to should
141	Ken Min	Negative	4.1.4	2nd Para	Technical	Change back to a 'SHOULD' depending on the decision from paragraph above.	Change back to a 'SHOULD' depending on the decision from paragraph above.	Accepted: Revert to should voted in SLC

147	William Martin	Negative	4.1.4		2 Technical	Keep as a "should" statement.	Reason for negative vote.	Accepted
155	Darryl Godfrey	Negative	4.1.4	P2S1	Technical	BASIS for NEGATIVEIOWs should not be mandated but selectively implemented based on the damage mechanism, risk and effectiveness of the IOW managing the risk.	IOWs not necessary for everything. Revert back to 'should'	Accepted: Revert to should voted in SLC
144	Michael Schmidt	NonVoter	4.1.4	2nd paragraph, last sentence	Editorial	Consider removing the words "on issues"		Accepted in principle
156	Ray Konet	Negative	4.1.5	1p1s	Technical	Change "should" to "shall". This is appropriate as meetings on RP 585, owner-operators indicated this is common practice.	Change "should" to "shall".	Rejected will draw negative
157	Christopher Archie	Negative	4.1.5	4.1.5	Technical	The terms near-missses and near-leaks are used but neither is defined in the document.	Include the definitions used in API RP 585: pressure equipment integrity near miss PEI near miss fixed equipment mechanical integrity near miss The discovery of equipment degradation or process operating conditions outside of acceptable limits that requires immediate or other unplanned action to shut down the equipment and/or perform repairs to avoid a loss of containment, usually the result of some form of damage mechanism such as those covered in API 571 but did not result in a loss of containment or structural stability. Within this document, the term "near miss" is intendedto refer to a PEI near miss.	Accepted
158	Christopher Archie	Negative	4.1.5	4.1.5	Technical	The terms near-missses and near-leaks are used but neither is defined in the document.	Include the definitions used in API RP 585: pressure equipment integrity near miss PEI near miss fixed equipment mechanical integrity near miss The discovery of equipment degradation or process operating conditions outside of acceptable limits that requires immediate or other unplanned action to shut down the equipment and/or perform repairs to avoid a loss of containment, usually the result of some form of damage mechanism such as those covered in API 571 but did not result in a loss of containment or structural stability. Within this document, the term "near miss" is intendedto refer to a PEI near miss.	Duplicate Comment

159	Leslie Ward	Negative	4.1.5	1st	Technical	Change "should" to "shall" in the first sentence. "The owner-operator should investigate PEI incidents and near-misses (near-leaks) to determine causes (root, contributing, and direct) that may result in updates to the associated inspection program, IOW, corrosion control document (CCD), etc."	Change the first sentence to state: "The owner-operator shall investigate PEI incidents and near-misses (near-leaks) to determine causes (root, contributing, and direct) that may result in updates to the associated inspection program, IOW, corrosion control document (CCD), etc."	Rejected will draw negative
747	Mark Hume	Negative	4.1.6	Paragraph	General	This section for CCDs is not helpful in it's current state. Would like to see it summarize the CCD program better.	Get the band together to review this section to provide a summary of information similar to section 4.1.4 IOWs. Ensure the DMR process and definition for damage mechanism assignment is either covered in more detail or pulled out into a new section.	Noted Add to scorecard for committee
160	Leslie Ward	Negative	4.1.6	1st	General	Remove the RP between API & 970 in the first sentence. See also 5.4.1 API RP 571 in the third sentence. See also 5.5.6.5 API RP 2218 in the last existing sentence. Check for other locations where API RP is still shown. If the style guide expects them to be included sometimes but not all then just follow the new 2025 API Document Style Guide.	Change the sentence to state: "The owner-operator may develop a CCD for each process unit in accordance with the work process contained in API 970 or alternate methodology outlining all the mechanical integrity damage mechanisms to which the equipment and piping in the process unit are susceptible."	accepted
161	Robert Sladek	NonVoter	4.1.6	P1, S1	Technical	I believe we should make this an "if, then" statement in regards to 970 being a best practice. That is, if you are going to do CCDs, they shall be in accordance with 970. Similar to how we treat RBI and 580. Remove "or alternate methodology".	"The owner-operator may develop a CCD for each process unit in accordance with the work process contained in API RP 970 outlining all the mechanical integrity damage mechanisms to which the equipment and piping in the process unit are susceptible."	accepted
162	Robert Sladek	NonVoter	4.1.6	P1, S1	Technical	Consider "should" instead of "may". Not sure granting permission is the way to go here.	"The owner-operator SHOULD develop a CCD"	accepted
164	Ibrahim Kodssi	NonVoter	4.1.6	4.1.6	Technical	Replace the word May with Shall in the first sentence "The owner-operator may"	Replace the word May with Shall in the first sentence "The owner-operator may"	Rejected: no change this would draw multiple negatives
163	Abhishek Gupta	NonVoter	4.1.6	Definition, line 5	Editorial	"fixed equipment integrity."- may change to "pressure equipment integrity" to remain consistent with rest of the document.	change to "pressure equipment integrity" instead of "fixed equipment integrity"	accepted

736	Mark Hume	Negative	Add new DMR Section (4.1.7?)	Paragraph	General	The entire document consistently uses the concept of an asset level Damage Mechanism Review without ever defining it.	Incorporate similar content as API 580 4th edition, including a definition for "Credible damage mechanism" (API 580 3.1.10) and build out a dedicated section with additional details for a DMR (see API 580 Section 9). We should clarify on the difference between System level CCD damage reviews vs Circuit/Asset level Damage Reviews.	Noted: future work by TG or ME
165	Robert Sladek	NonVoter	4.2.	P1, S1	Technical	Nested "shall"? Replace "is responsible to the owner-operator to " with "shall". Or add an "and shall" like the Repair Organization.	"The pressure vessel engineer SHALL make certain..." or "The pressure vessel engineer is responsible to the owner-operator AND SHALL make certain..."	Not Accepted
167	Brian Boss	Negative	4.4.	all	Technical	Do not just put the definition here, explain the responsibilities of the organization	update wording, keep definition in definitions	accepted revert to original and put in definitions (only used once in document)
166	Tami Glasper	NonVoter	4.4	4.4	General	There is a statement under Authorized Inspector that says his equipment as a recommended change.	The wording is his/her or delete the pronoun.	Rejected, Section removed
168	Abhishek Gupta	NonVoter	4.4	Para c)	Editorial	Suggest rewording: the inspection organization of an owner-operator of pressure vessels who maintains an inspection organization for his equipment only and not for vessels intended for sale or resale;	Reword as "the inspection organization of an owner-operator of pressure equipment authorized to maintain all owner-operator pressure equipment, excluding the equipment intended for sale, resale or scrapping;"	Rejected, Section removed
169	Abhishek Gupta	NonVoter	4.4	Para c)	Editorial	an independent organization or individual- replace individual with inspector	Change as "an independent organization or inspector"	Rejected, Section removed
176	Robert Sladek	NonVoter	4.5.	P1, S1	Technical	Treat intro similar to other roles: "assure" could be a nested "shall"?	"The inspector is responsible to the owner-operator AND SHALL MAKE CERTAIN the inspection, NDE,..."	Accepted
170	William Martin	Negative	4.5	1	Technical	"Inspectors shall be certified by an internationally recognized..." Why add this for a standard that is U.S.-centric? If there are other certifications that we want to accept, then we should add them.	Do not add.	Noted: Andri to provide language per api requirements
171	Brian Boss	Negative	4.5	1	Technical	Inspectors shall be certified by international recognized organization - shouldn't this be API 510 certified? What other organization are we intending cover this?	leave as original wording	Not accepted. We can't mandate the use of the ICP.
172	Mark Geisenhof f	Negative	4.5	2nd to last sentence	Technical	Do not agree with indicating the inspectors shall be certified by an internationally recognized organization". Inspectors should be certified to API 510 in order to perform the responsibilities of API 510.	Basis of negative. Leave original wording as is: Inspectors shall be certified in accordance with the provisions of Annex B	Not accepted. We can't mandate the use of the ICP.
173	Denizhan GUL	NonVoter	4.5	new sentence	General	Inspectors shall be certified by API. The phrase "recognized organization" is unclear and would be better if clarified or replaced with a more precise reference.		Not accepted. We can't mandate the use of the ICP.

174	Darryl Godfrey	Negative	4.5	P1S5	Technical	BASIS for NEGATIVEThe term 'internationally recognised organisation' is not well defined. Is there a list that can be referenced? Maintained and managed by who? This statement would be problematic if applied outside of the US. For example Australia uses Australian Institute for Certifying Inspection Personnel (AICIP) certified inspectors and AICIP is recognised within Australia bt not internationally hence this requirement, as written, would exclude 600+ AICIP registered inspectors. Language needs to be modified to include Locally recognised inspection certification organisations.	Modify to include locally recognised inspection certification organisations. Inspectors shall be certified by an internationally or locally recognized organization (see Annex B for details regarding the API 510 Individual Certification Programs).	Noted: Andri to provide language per api requirements
175	Adam Keown	Negative	4.5 (New)		1 Technical	The new text says that "Inspectors shall be certified by an 'internationally recognized organization' (see Annex B for details regarding the API 510 Individual Certification Programs)." What other certifications would qualify an inspector if they didn't have an API 510 certification?	Basis for Negative - Revert to original text. I don't see how this helps	Noted: Andri to provide language per api requirements
177	Abhishek Gupta	NonVoter	4.6 Examiners	4.6.3	Technical	"The owner-operator shall assure all individuals taking thickness readings are trained and qualified as a UT TM (thickness-monitoring) examiner in accordance with the applicable procedure used during the examination." - Not sure if this sentence fits here. It can be moved to the NDE section where we talk about UT thickness measurements.		Removed from 4.6.3 - combined with 5.5.5.5
178	Terry Blue	Negative	4.6.3	1st sentence	Technical	The word "assure" is probably a misuse of "ensure" which isn't a great word for code documents.	Use "verify" instead of "assure".	Removed from 4.6.3 - combined with 5.5.5.5
179	Edward Sanchez	Negative	4.6.3	P1, S1	Editorial	Change "assure" to "ensure."	Change "assure" to "ensure." In addition, look for other uses of "assure" and chane them as necessary.	Removed from 4.6.3 - combined with 5.5.5.5. ME: "Assure vs. ensure vs insure" proposed action noted for task group acceptance and action team development. 5 cases of "ensure" and 13 cases of "assure". Style guide: — to "insure" means that money is paid by an insurance company if the event that is insured against occurs; — to "assure" is to convince or promise someone; — to "ensure" is to do something that will cause a particular result or outcome;
180	Christopher Archie	Negative	4.6.3	4.6.3	Editorial	Change "assure" in the first sentence to "ensure". Ensure means to guarantee. Assure means to promise.	The owner-operator shall ensure all individuals taking thickness readings are trained and qualified as a UT TM (thickness-monitoring) examiner in accordance with the applicable procedure used during the examination.	Removed from 4.6.3 - combined with 5.5.5.5
181	Christopher Archie	Negative	4.6.3	4.6.3	Editorial	Change "assure" in the first sentence to "ensure". Ensure means to guarantee. Assure means to promise.	The owner-operator shall ensure all individuals taking thickness readings are trained and qualified as a UT TM (thickness-monitoring) examiner in accordance with the applicable procedure used during the examination.	Noted. Duplicate comment.

182	Mark Geisenhof	Negative	4.6.3	1st new sentence	General	Newly added sentence is unnecessary and does not add clarity to the existing text.	Delete new sentence	Accepted Voted and approved in SLC
183	Brian Boss	Negative	4.6.3	all	Technical	unnecessary shall statement	leave as original wording	Removed from 4.6.3 - combined with 5.5.5.5
184	Ray Konet	Negative	4.6.3	1s	Technical	This requirement mixes a couple different points that I'm not sure what it is driving. What is the problem we are fixing.	Not sure what to do....	Removed from 4.6.3 - combined with 5.5.5.5
185	Adam Keown	Negative	4.6.3 (New)	1 (new sentence)	Technical	Owner-operators are responsible for all aspects of inspections on their equipment, but require them to assure the training and qualifications of contract technicians is not their responsibility. They should be checking this, but it is ultimately the responsibility of the examiner's employer.	Basis for negative - Eliminate the new text.	Removed from 4.6.3 - combined with 5.5.5.5
186	Robert Sladek	NonVoter	4.7.	All	Technical	There is a shall statement here that says other (non-MI) personnel shall notify the inspector or engineer. However, we do not have any training requirements. Adding training requirements could also bolster "Operator Surveillance"	Add new paragraph: "The owner-operator is responsible to train all site personnel about the timely notification of issues related to pressure vessels and PRDs."	Noted future discussion needed
187	Denizhan GUL	NonVoter	4.8	f	General	data verification may also be included	 Data analysis, evaluation, recording and verification are adequate	Accepted
190	Robert Sladek	NonVoter	4.8.	P2, S1.new	Technical	Add a new bullet about auditing training and certification	"inspection and examination personnel are qualified, certified and properly trained to the owner-operator requirements."	Accepted
188	Christopher Archie	Negative	4.8	3rd paragraph	Editorial	3rd paragraph, 3rd sentence. Is "needs to" a requirement or suggestion? "Each organization needs to establish a system for tracking and completion of corrective actions generated from audit findings." Change "needs to" to "should",	Each organization should establish a system for tracking and completion of corrective actions generated from audit findings.	Not accepted
189	Christopher Archie	Negative	4.8	3rd paragraph	Editorial	3rd paragraph, 3rd sentence. Is "needs to" a requirement or suggestion? "Each organization needs to establish a system for tracking and completion of corrective actions generated from audit findings." Change "needs to" to "should",	Each organization should establish a system for tracking and completion of corrective actions generated from audit findings.	Noted. Duplicate comment.
191	Robert Sladek	NonVoter	5.1.1	P1, S2	Editorial	Use the word "address" instead of "cover".	"Inspection plans shall be developed to ADDRESS all credible damage..."	Accepted
198	Darryl Godfrey	Negative	5.1.1	P1S1	Technical	PRDs need inspection plans so "and PRDs" should not be deleted	Revert back to original wording that includes PRDs	Accepted

192	Michael Schmidt	NonVoter	5.1.1	1st paragraph	Technical	consider revising the listed inspection types to be consistent with revised defined terms for internal visual and external visual inspections.	Consider revising as follows: "Inspection plans shall be developed to cover all credible damage mechanisms, as well as code and jurisdictional requirements and may include multiple types of inspections such as: internal visual, on-stream, external visual, and thickness examinations."	Accepted in principle, not an exhaustive list.
193	Mark Geisenhof	Negative	5.1.1	2nd sentence	Technical	Added "shall" is not necessary and should be changed back to "should"	basis of negative: Change "shall back to : "should"	Accepted Voted and approved in SLC
194	Brian Boss	Negative	5.1.1	all	Technical	unnecessary changes, keep as is.	leave as original wording	Accepted
195	William Martin	Negative	5.1.1	1	Technical	This seems like a duplication of 5.1.2.2.	Do not add.	Accepted
196	Adam Keown	Negative	5.1.1	1	Technical	An inspection plan may not be needed for all credible damage mechanisms. Some damage mechanisms may be managed through replacement strategies or if the consequence is low, may not require inspection at all.	Basis for negative - Revert back to should from shall	Accepted
197	Terry Blue	Negative	5.1.1	2nd Sentence	Technical	Inspection plans cannot be established for all credible damage mechanisms. In some cases, risk is more effectively managed through non inspection measures rather than direct inspection. Requiring an inspection plan for every damage mechanism can therefore result in unnecessary and ineffective inspections.	Basis of Negative - Revert back to "should" instead of "shall".	Accepted
199	Darryl Godfrey	Negative	5.1.1	P1S2	Technical	Inspection plans cannot be established for all credible damage mechanisms. In some cases, risk is more effectively managed through non inspection measures rather than direct inspection. Requiring an inspection plan for every damage mechanism can therefore result in unnecessary and ineffective inspections. Some damage mechanisms (e.g., brittle fracture, embrittlement, etc.) are better addressed through material selection, IOWs, etc. Inspection may play a part in detecting damage when the operating conditions deviate from design conditions and expose existing equipment to damage.	Revert back to 'should' not 'shall'	Accepted
201	Ibrahim Kodssi	NonVoter	5.1.2.1	5.1.2.1	Technical	Add "or CCDs" in the sentence "A corrosion specialist shall be"	Add "or CCDs" in the sentence "A corrosion specialist or CCDs shall be"	Noted No change for the next ballot
207	Robert Sladek	NonVoter	5.1.2.2	P1, S2	Technical	We should use "and" here as any present DM would be credible, no?	"Equipment shall be evaluated based on present AND credible types of damage mechanisms."	Accepted
202	Ibrahim Kodssi	NonVoter	5.1.2.2	5.1.2.2	Technical	Partially covered by covered by 5.1.3 and 5.1.4.	Remove the text "An inspection plan should.....to monitor a particular damage."	not accepted: see SK206 revert to original

206	Brian Boss	Negative	5.1.2.2	all	Technical	unnecessary changes, keep as is.	leave as original wording	accepted
208	Robert Sladek	NonVoter	5.1.2.2	P1, S3	Technical	I like adding "morphology" to the bulleted list and believe it would improve this sentence as well. Replace "mechanism" with "morphology"	"The methods and the extent of NDE shall be evaluated to assure the specified techniques can adequately identify the damage MORPHOLOGY and the extent and severity of damage."	Noted, revert to original due to other negative
200	Abhishek Gupta	NonVoter	5.1.2	5.1.2.2 j)	Technical	"Morphology of damage observed/anticipated, as the morphology of damage will decide the type of NDE to be employed to monitor a particular damage." - move as suggestion.	- Can move this to under (a) type, morphology & extent of damage mechanism observed or anticipated (this can help decision on NDE method to be employed for monitoring) - Can remove j)	not accepted: see SK206 revert to original
203	Joseph Krynicki	Negative	5.1.2.2	j	Editorial	Change "decide" to "influence".	Change "decide" to "influence".	Accepted
204	Terry Blue	Negative	5.1.2.2	j)	Technical	Damage morphology should not be included in the inspection plan. This consideration is already addressed when evaluating item d), making its inclusion here redundant and potentially confusing. At the very least, it would add another documentation requirement.	Delete the added bullet.	Not accepted with edit
205	Adam Keown	Negative	5.1.2.2	j (New)	Technical	The aspect makes sense, but the wording is not clear. A clearer explanation of what this is referring to would be better.	Proposed wording change to, "Type of NDE to monitor the anticipated or observed damage as it progresses"	Accepted edit
209	Ray Konet	Negative	5.1.2.2	j)	Technical	This is redundant with words in the first paragraph that NDE be evaluated against daage mechanism. You could add morphology to a).	Suggest change a) to Type and morphology of damage mechanism	Accepted
212	Terry Blue	Negative	5.1.2.3	Sentence 1	General	There are two instances of the phrase "as needed," even though Annex G of the style guide requires requirements to be stated using unambiguous language.	Determine how to reconcile this with the style guide requirements.	Accepted in principle: replaced "as needed" with "when conditions affecting the equipment integrity change. "
210	Darryl Godfrey	Negative	5.1.2.3	P1S3	Technical	Add API 576 to list to include information on issues with PRDs that may assist in the development of PRD inspection plans.	Add API 576	Accepted
211	Robert Sladek	NonVoter	5.1.2.3	P1, S3	Technical	We can glean more from similar service vessels than just what a risk analysis can provide.	"Sources of information may include process unit CCDs, RBI assessments, IOWs, past inspections, past failures (industry, company and site) and DISCOVERIES FROM vessels in similar service..."	Noted no change; will draw a negative and I think we have it covered
213	Terry Blue	Negative	5.1.3	Bullet a)	General	There are 16 instances of "etc." in the document, despite Annex G of the style guide explicitly discouraging its use under the unambiguous requirement. The guide states: "Avoid use of 'etc.' because it is inherently ambiguous."	Determine how to reconcile this with the style guide requirements.	Accepted in principle: ME to determine

214	Darryl Godfrey	Negative	5.1.3	P1 Bullet c	Technical	Revise bullet c to include testing as a part of inspection plans for pressure equipment and PRDs.	Modify bullet c to include testingc) describe the inspection, testing and NDE techniques	Accepted
215	Robert Sladek	NonVoter	5.1.5	P1, S1	Technical	"created by the inspector and/or engineer" is unnecessary since this is a requirement in 5.1.2.1 P1, S1.	"The inspection plan should be executed by an inspector and examiner assigned to conduct the inspection at the designated time."	Accepted
216	Robert Sladek	NonVoter	5.1.5	P1, S2	Technical	There are many requirements for the inspection and/or engineer to develop a plan. Why are plan deviation approvals a "should"? Change to "shall".	Deviations from the inspection plan SHALL be approved by the responsible owner-operator inspector, engineer, or designee.	noted future discussion needed will draw negatives
217	Ibrahim Kodssi	NonVoter	5.10.4	5.10.4	Technical	Add "or if it was identified in the CCDs." after "indicate the need"	Add "or if it was identified in the CCDs." after "indicate the need"	Rejected this is inferred. CCDs are based on or use the temps and service conditions
218	Leslie Ward	Negative	5.11.5	1st	Editorial	In the first sentence, make high-temperatures singular. "Flanges in high-pressure and/or high-temperatures services that have been boxed in or leaked on-stream during the previous operating run should receive special attention during inspection and maintenance outages to determine what corrective action is appropriate to avoid further leaks."	Change the first sentence to state: "Flanges in high-pressure and/or high-temperature services that have been boxed in or leaked on-stream during the previous operating run should receive special attention during inspection and maintenance outages to determine what corrective action is appropriate to avoid further leaks."	Accepted
219	Leslie Ward	Negative	5.11.6	1st	Editorial	In the third sentence, make owner-operator plural. Add comma after Appendix A. "Owner-operator should follow the guidance in this ASME PCC-1, Appendix A with their own training and qualification program or use an external organization providing such services"	Change the third sentence to state: "Owner-operators should follow the guidance in this ASME PCC-1, Appendix A, with their own training and qualification program or use an external organization providing such services."	Accepted
241	Brian Boss	Negative	5.2.1	all	Technical	unnecessary changes, keep as is.	leave as original wording	Accepted Voted and approved in SLC
243	Denizhan GUL	NonVoter	5.2.1	first paragraph	General	I want to emphasize the following: it is important to distinguish between the RBI program, RBI assessment, and RBI program audit or program assessment. The full RBI program according to API 580 shall be applied, since conducting only the RBI risk assessment or analysis such as API 581 may not be sufficient to fulfill the all requirements of the complete API 580 RBI program.	RBI Program can be used to determine inspection plans. (First paragraph, first sentence)	Noted, no change, this is essentially what it already says
220	Abhishek Gupta	NonVoter	5.2	5.2.1 Para 1, line 3	Editorial	ERROR	suggest to replace "modify inspection intervals" to "optimize inspection intervals"	Verbiage removed by SK241
232	William Martin	Negative	5.2.1	1	Technical	"to modify inspection intervals in section 6" implies that modifying the intervals is the only reason for RBI or that if RBI is used for another purpose that 580 is not necessary.	Leave as is.	Accepted Voted and approved in SLC

228	Ray Konet	Negative	5.2.1	2p	Technical	This paragraph deals entirely with RBI and the methodology. Not only do I believe the words aren't appropriate, they don't belong in this code but 580. Further, the text is not informative, what do you want the owner-operator to do.	Delete paragraph.	Verbiage removed by SK241
242	Mark Geisenhof	Negative	5.2.1	2nd paragraph (new)	Technical	This new paragraph is ambiguous and not needed	Delete new paragraph	Accepted Voted and approved in SLC
221	Abhishek Gupta	NonVoter	5.2	5.2.1 Para 2, line 3	Editorial	ERROR	suggest to replace "owner-user" with "owner-operator", to stay consistent as 'owner-operator'.	accepted
226	Darryl Godfrey	Negative	5.2.1	P2	Technical	BASIS for NEGATIVE RBI program limitations and gaps – Use of word 'all' is hard to quantify whether 'all' gaps and limitations have been addressed. Where is the definitive list that defines all requirements API 580, API 581, etc. "No RBI program can address every potential damage mechanism or operating scenario. Understanding the gaps and limitations of the RBI software/approach can support informed decisions when developing or maintaining an MI program."	Replace the new paragraph with the following "No RBI program can address every potential damage mechanism or operating scenario. Understanding the gaps and limitations of the RBI software/approach can support informed decisions when developing or maintaining an MI program."	Accepted in principle voted in SLC to remove added content
229	Zongqi Sun	AffirmativeWithComment	5.2.1	2nd paragraph 2nd sentence	Editorial	"owner-user's...to identify all gaps and limitations ... structure an appropriate ..." the term needs be consistent and the sentence needs be concise.	owner-operator's... to identify any gap from RBI process and manage the associated risk.	Verbiage removed by SK241
230	Terry Blue	Negative	5.2.1	3rd para	Technical	The added text stating, "It is the owner user's responsibility to identify all gaps and limitations from the RBI software/approach used and structure an appropriate MI program to cover these limitations," is overly prescriptive in tone.	Basis of Negative - Change the paragraph to: "No RBI program can address every potential damage mechanism or operating scenario. Understanding the boundaries of the RBI approach can support informed decisions when developing or maintaining an MI program."	Verbiage removed by SK241
231	Edward Sanchez	Negative	5.2.1	P2, S2	Editorial	Remove the dummy pronoun "It" at the beginning of the sentence.	Reword the beginning of the sentence to "The owner-user is responsible for identifying..."	Verbiage removed by SK241
233	William Martin	Negative	5.2.1	2	Technical	Sentence 2 basically says to do what Sentence 1 says is not possible.	Do not add. Reason for negative vote.	Verbiage removed by SK241
236	Rick Nichols	AffirmativeWithComment	5.2.1	Para. 2	Editorial	Owner-user (archaic)	Change owner-user to "owner-operator"	accepted
237	Adam Keown	Negative	5.2.1	2	Technical	The 2nd sentence states, "It is the owner-user's responsibility to identify all gaps and limitations from the RBI software / approach used and structure an appropriate MI program to cover these limitations". This is not possible to identify all gaps and limitations	Basis for negative - Remove the sentence.	Verbiage removed by SK241

227	Darryl Godfrey	Negative	5.2.1	P3S1	Technical	Inspection plans are also needed for PRDs and testing should be included in bullet a) and testing in bullet c)After an RBI assessment is conducted, the results may be used to establish the vessel inspection plan and better define the following:a) the most appropriate inspection and NDE methods, tools, and techniques;c) the interval for internal, external, and on-stream inspections;	Modify to After an RBI assessment is conducted, the results may be used to establish the inspection plan and better define the following:a) the most appropriate inspection, testing and NDE methods, tools, and techniques;c) the interval for internal, external, and on-stream inspections and/or testing	Verbiage removed by SK241
234	William Martin	Negative	5.2.1	3	Technical	Seems more like content for API 580.	Do not add.	Accepted Voted and approved in SLC
235	Christopher Archie	Negative	5.2.1	3rd paragraph	Technical	Change "may" to "should".	"After an RBI assessment is conducted, the results should be used to establish the vessel inspection plan and better define the following:"	Accepted in principle voted in SLC to remove added content
238	Adam Keown	Negative	5.2.1	3	Technical	Revise establish. Establish would be for the initial inspection plan development, but for RBI assessments, the inspection plan is modified and updated with every assessment	Change from "establish" to "modify or update"	Verbiage removed by SK241
239	Christopher Archie	Negative	5.2.1	3rd paragraph	Technical	Change "may" to "should".	"After an RBI assessment is conducted, the results should be used to establish the vessel inspection plan and better define the following:"	Noted. Duplicate comment.
245	Michael Schmidt	NonVoter	5.2.1	3rd paragraph	Editorial	Consider revising the "may" to "should" in the 1st sentence		Verbiage removed by SK241
244	Robert Sladek	NonVoter	5.2.1	P3, S1, b	Technical	add location to the bullet.	"the location and extent of NDE (e.g., percentage of vessel to examine);"	Accepted
240	Leslie Ward	Negative	5.2.1	3rd	Technical	Why are only internal, external, and on-stream listed in item c? "After an RBI assessment is conducted, the results may be used to establish the vessel inspection plan and better define the following:" c. the interval for internal, external, and on-stream inspections." Section 6.3.1 includes CUI/CUF/ECSCC, and thickness examinations.	Consider changing item c). Item c) should state: "c) the interval for internal, external, on-stream, CUI/CUF/ECSCC inspections, and thickness examinations"	noted voted in SLC to remove added content
246	Michael Schmidt	NonVoter	5.2.1	sub paragraph c)	Technical	Consider revising for consistency with the definition of inspections.	"Consider revising as follows: ""c)the interval for internal visual, external visual , and on-stream inspections"""	Noted ME to determine appropriate action
259	Ibrahim Kodssi	NonVoter	5.2.2	5.2.2	Technical	Add "the pressure boundary of" to the statement "expected to affect a vessel in any particular service"	expected to affect the pressure boundary of a vessel in any particular service"	Rejected will draw negative
249	Robert Sladek	NonVoter	5.2.2	P1, S2	Technical	We say these are examples but are trying to include everything under the sun. I honestly do not see the value in this sentence. We have a definition for damage mechanism with a 571 reference, do we really need to list "examples" AND examples of examples.	Delete sentence as it is unnecessary bloat which distracts the reader from these 2 statements.	Rejected may draw negative

250	Robert Sladek	NonVoter	5.2.2	P1, S3	Technical	poor wording for a shall statement - should not use "Additionally" or "credible". Not sure "mechanism is needed here and "evaluated" is a poor word choice.	"The effectiveness of the inspection practices, tools and techniques used for locating and quantifying the damage shall be considered".	Rejected may draw negative
748	Mark Hume	Negative	5.2.2	Bullets a,c,e	Technical	Bullets a,c,e are often things we "assume" to be adequate in RBI assessments. I don't believe API 580 directly addresses these items either.	Revisit this list and remove or clarify the bullet points. Consider leveraging content from API 580 10.4.1 (has bullets for "Determination of POF")	Accepted
251	Robert Sladek	NonVoter	5.2.2	P2, S1	Technical	This is an oddball, 1 sentence paragraph that was likely intended to be a bullet in the above list.	Remove this paragraph and add "h) equipment failure data" to the previous bulleted list.	Accepted
248	Michael Schmidt	NonVoter	5.2.2	3rd paragraph	General	This paragraph seems to apply whether or not RBI is used.		Noted no change
253	Mark Geisenhof	Negative	5.2.2	2nd paragraphh (new)	Technical	This new paragraph is a random cautionary note that does not fit within this document.	Delete new paragraph	Accepted Voted and approved in SLC
254	Brian Boss	Negative	5.2.2	new paragraph	Technical	unnecessary changes, Remove or reword. Don't introduce how-to or 'conventional approach' that 'can lead' to something.	Reword or eliminate new paragraph	Accepted Voted and approved in SLC
255	Adam Keown	Negative	5.2.2		3 Technical	This paragraph gives detail on corrosion rate determination that is too detailed for API 510. If any verbiage is needed here, it should point to the guidance in API 580/581 or Section 7.1 Corrosion Rate Determination of API 510. This is much too prescriptive and makes assumptions about how corrosion rates are determined.	Basis for negative - Remove the paragraph	Accepted Voted and approved in SLC
258	William Martin	Negative	5.2.2		3 Technical	This does not belong in an RBI section as it could apply to all equipment. In addition, what it seems to be trying to address is localized corrosion being analyzed as general corrosion. That issue should be addressed differently.	Do not add.	Accepted Voted and approved in SLC
260	Terry Blue	Negative	5.2.2	Last para	Technical	This content is informational in nature and appears outside the intended scope of API 510. It would be more appropriately addressed in API 580 or API 572. Additionally, the use of the term "appropriately" introduces subjectivity and is not well suited for a code document.	Basis of Negative - Delete Paragraph.	Accepted Voted and approved in SLC
262	Ray Konet	Negative	5.2.2	last P	Technical	This caution statement belongs in 580, not here. These statements are focussed on RBI when they apply to all programs.	Delete paragraph.	Accepted Voted and approved in SLC
222	Abhishek Gupta	NonVoter		5.2.2 Para 2, line 1	Editorial	ERROR	replace "fixed" with "pressure", to stay consistent	Paragraph removed with SK 255
261	Zongqi Sun	AffirmativeWithComment	5.2.2	2nd paragraph 1st sentence	Editorial	1st sentence: "fixed equipment" term needs be consistent in the code. 3rd sentence: "owner-user"last sentence: verbose	1st sentence: equipment3rd sentence: owner-operator last sentence: ...approach is to continue monitoring the CMLs...	Paragraph removed with SK 255

223	Abhishek Gupta	NonVoter	5.2	5.2.2 Para 2, line 3	Editorial	ERROR	suggest to replace "owner-user" with "owner-operator", to stay consistent as 'owner-operator'.	Noted. Duplicate comment.
247	Michael Schmidt	NonVoter	5.2.2	3rd paragraph 3rd sentence	General	Consider revising owner-user to owner-operator for consistency with wording in other paragraphs.		accepted
252	Robert Sladek	NonVoter	5.2.2	P3, S3	Technical	I think the guidance here is to make sure that the rate used does not jeopardize components which were not modeled and may have a shorter remaining life. Consider the minor editing provided	"The owner-user should verify that any representative corrosion rate utilized is appropriately conservative for THE ENTIRE asset."	noted, para 3 was voted on in SLC
256	Rick Nichols	AffirmativeWithComment	5.2.2	2nd Paragraph	Editorial	Same as 5.2.1	Change Owner-user to "Owner-operator"	accepted
257	Grady Hatton	Negative	5.2.2	Last para	Technical	What is meant by appropriately conservative?	Basis for Negative - Cannot measure "appropriately conservative" This is subjective and can change from one person to the next.	Accepted Voted and approved in SLC
263	Darryl Godfrey	Negative	5.2.2	P3S3	Technical	'appropriately conservative' is poorly defined use 'appropriate' as the degree of conservatism may depend on the consequences of failure.	The owner-user should verify that any representative corrosion rate utilized is appropriate for each asset.	Accepted Voted and approved in SLC
267	Robert Sladek	NonVoter	5.2.3	P1, S2	Technical	"may" is permission, "can" is possibility". I think the intent here is the assessment SHALL consider incidents that CAN occur as a result of fluid release. This would be easier to comprehend if reordered and formatted as a bulleted list. Merge P1, S3 with this bulleted list.	The consequence assessment shall consider the following resulting from a potential fluid release: * the type of release (includes explosion, fire, or toxic exposure.) * the size and duration of release, and * the potential incidents that CAN occur resulting from the release (e.g., health effects, environmental damage, equipment damage, and equipment downtime and reputation)	noted see edit in SK 264

264	Joseph Krynicki	Negative	5.2.3	first	General	Delete "reputation". Reputation of the owner does not affect the integrity equipment, but rather financial impact to the owner. Public perception is not necessary for this integrity document.	Change "reputation" to "public impact, e.g., road closures".	The consequence of a release is dependent on type and amount of process fluid contained in the equipment. The consequence assessment shall consider the potential incidents that may occur as a result of fluid release, the size and duration of a potential release, and the type of a potential release (includes explosion, fire, or toxic exposure.) The assessment shall also determine the potential incidents that may occur as a result of fluid release, which may include health effects, environmental damage, equipment damage, equipment downtime and reputation. The
265	William Martin	Negative	5.2.3	1	Technical	The last sentence seems like it should be divided into two.	The assessment shall also determine the potential incidents that may occur as a result of fluid release. Consequences may include health effects, environmental damage, equipment damage, equipment downtime, and reputation.	noted see edit in SK 264
266	Adam Keown	Negative	5.2.3	1	Technical	Including "and reputation" feels out of place. This is included in many risk matrices, but is not the primary consequence. If this is needed to be included, reword to reference "financial consequences"	Propose to eliminate or to change to, "The assessment shall also determine the potential incidents that may occur as a result of fluid release, which may include health effects, environmental damage, equipment damage, and financial damages."	noted see edit in SK 264
268	Robert Sladek	NonVoter	5.2.3	P1, S3	Technical	Merge this sentence with the preceeding. The only difference in wording is "consider" vs "determine". Not sure the resulting confusion is value added as a separate sentence.	See comment 5.2.3, P1, S2	noted see edit in SK 264
269	Robert Sladek	NonVoter	5.2.5	All	Technical	This section should discuss updates, not intervals and frequencies. Intervals and frequencies addressed in Section 6. Also, P1, S3 conflicts with 6.3.2.	Move this subsection to 6.3 and merge with existing verbiage. Change subsection title to "Updates to RBI Assessments" and change the discussion to time-based and event-based updates. Remove the newly added P1, S3 and consider merging the 2 TAR max interval for time-based updates in with 6.3.2.	Noted, voted on this section in SLC may draw negatives if we change again
273	Brian Boss	Negative	5.2.5	all	Technical	Tacked on sentence, while, good intention, is contradictory to time limits elsewhere in the document. "RBI revalidation" is not defined - usually we use revalidation for a DMR, a broader review rather than individual RBI assessment/analysis.	leave as original wording	Accepted Voted and approved in SLC

270	Robert Sladek	NonVoter	5.2.5	P1, S1	Technical	Change this sentence to singular tense instead of the plural. We are mandating assessment updates - remove the unnecessary API 580 reference.	"When an RBI assessment is used to set a vessel inspection interval, the assessment shall be updated after each vessel inspection."	Noted, voted on this section in SLC may draw negatives if we change again
275	Lestlie Ward	Negative	5.2.5	1st	Editorial	Add the word "fluid" after "process". See similar item for 4.1.3. Add comma before and.	Change the sentence to state: "The RBI assessment shall also be updated each time process fluid or hardware changes are made that could significantly affect damage rates or damage mechanisms, and anytime an unanticipated failure or inspection discovery occurs due to a damage mechanism."	Rejected - could be more than just fluid constituents. E.g., pressure, temperature.
224	Abhishek Gupta	NonVoter	5.2	5.2.5 line 6	Editorial	ERROR	suggest to replace "turnaround to enter" with "turnaround for thorough inspection and assessment"	removed with SK273
271	Robert Sladek	NonVoter	5.2.5	P1, S3	Technical	We are using the term "revalidation" which is no longer defined in this document. We should use the term "time-based update" as recently defined in API 580.	"An RBI time-based update shall be conducted..."	Noted, voted on this section in SLC may draw negatives if we change again
272	Michael Schmidt	NonVoter	5.2.5	1st paragraph last sentence	General	Wording in last sentence is confusing from a terminology standpoint. Clarify terms and consistency with API 580.	Clarify the use of terms revalidation, assessments, and evergreening with API 580 to clarify this "shall" statement.	Noted, voted on this section in SLC may draw negatives if we change again
274	Matt Caserta	Negative	5.2.5	Last Sentence	Technical	BASIS FOR NEGATIVE - The addition of "2 turnaround cycles" gives too much leeway for very long intervals between RBI analysis. The way this is written, if the turnaround cycle is 15 years, this clause would allow you to go 30 years between reassessments.	Remove this new sentence. Secondary option, change this to say "not to exceed 10 years," and remove the turnaround interval note. 10 years is common practice in industry for RBI reassessment.	rejected voted in SLC to keep original text
276	Mark Geisenhof	Negative	5.2.5	last sentence	General	Suggest matching wording in API 570 for reassessment. TA intervals should not factor into an assessment.	Replace last (new) sentence with words from API 570. The RBI assessment shall be reviewed, updated as necessary, and approved by the engineer and inspector at intervals not to exceed 10 years.	rejected voted in SLC to keep original text
277	David Wang	Negative	5.2.5	last sentence	Technical	This is the only place in the document talking about "2 turnaround intervals", inconsistent with the rest of the document, which has only 10 years max. Delete the 2 turnaround intervals to be consistent.	An RBI revalidation shall be conducted at intervals not to exceed 10 years.	Accepted Voted and approved in SLC
278	Adam Keown	Negative	5.2.5	1	Technical	Using a term like turnaround interval is not consistent from company to company and doesn't give the same limit as a defined number of years. If people want more time, then extending to a longer duration than 10 years. Some units don't come down for a turnaround except once every 15 years. Does that mean that they don't require a revalidation for 30 years?	Basis for negative - Revert to only 10 years.	Accepted Voted and approved in SLC
279	Christopher Archie	Negative	5.2.5	5.2.5	Technical	Delete the last sentence. RBI revalidation interval is discussed in Section 6.3.2. The proposed 2 TA intervals is also in conflict with 10-year interval in Section 6.3.2.	Delete the last sentence or update 6.3.2 to be consistent.	noted voted in SLC to use 10 years

280	William Martin	Negative	5.2.5		1	Technical	Specifying two turnaround intervals opens the range for revalidations to be even more than double the 10 year interval in some cases. What makes it acceptable to go for that period of time for operations with longer turnaround intervals while penalizing those with shorter intervals by forcing them to use 10 years. Arguably, the knowledge of equipment condition is likely better when the turnaround interval is shorter.	Remove the reference to turnaround intervals.	Accepted Voted and approved in SLC
281	Christopher Archie	Negative	5.2.5	5.2.5		Technical	Delete the last sentence. RBI revalidation interval is discussed in Section 6.3.2. The proposed 2 TA intervals is also in conflict with 10-year interval in Section 6.3.2.	Delete the last sentence or update 6.3.2 to be consistent.	Noted. Duplicate comment.
282	Edward Sanchez	Negative	5.2.5	P1, Last sentence		Technical	Some owner-operators are considering and/or implementing 10-year intervals for some units such as Crude/Vacuum. Do we really want to allow 20 years between revalidation? Also, two turnarounds would probably be a good minimum interval as changes are bound to have occurred in that time span.	Consider changing the interval requirement to "the lesser of 10 years or 2 turnaround intervals."	noted voted in SLC to use 10 years
283	Carlos Salazar	NonVoter	5.2.5	Paragraph 1		Technical	From my experience perform a RBI validation should be less than 10 years	Modify the recommended interval to 5 years	Rejected will draw negative
284	Jared Williamson	Negative	5.2.5	1st paragraph		General	"An RBI revalidation shall be conducted at intervals not to exceed the greater of 10 years or 2 turnaround intervals for equipment that requires a turnaround to enter." We already say this in 6.3.2.	Either delete this or modify section 6.3.2 to include the desired wording.	noted voted in SLC to use 10 years
285	Darryl Godfrey	Negative	5.2.5	P1S3		Technical	It isn't clear how the RBI revalidation period should be different for equipment that requires a turnaround to enter. Reassessments or revalidations are different from evergreening and examine the whole extent of the original RBI assessment, including confirming the assumptions and scope of the original RBI assessment. It is not appropriate to do this based on whether equipment requires a TAR to enter. Align revalidation interval with API 570 requirements. An RBI revalidation shall be conducted at intervals not to exceed 10 years.	Replace last sentence with the following: An RBI revalidation shall be conducted at intervals not to exceed 10 years.	noted voted in SLC to use 10 years
749	Mark Hume	Negative	5.2.5	Last Sentence		Technical	"... or 2 turnaround intervals for equipment that requires a turnaround to enter."	Recommend deleting this part of the sentence. We have defined "RBI Revalidations" to be the broader, holistic review in API 580. This sentence allows that review to be pushed off for 15-20 years, which is a bit circular in reasoning as the RBI Assessment often enables the non-intrusive plans that helps extend those TAs. Is this not double dipping?	noted voted in SLC to use 10 year

225	Darryl Godfrey	Negative	5.2	All	General	"probability" has been replaced by "likelihood" throughout this document. This is inconsistent with the definition of risk in API 580 and need to be changed back to probability.	Use "probability" rather than "likelihood" throughout the document when discussing risk and referring to RBI for consistency with API RP 580 and API RP 581 definitions.	Accepted
286	Adam Keown	Negative	5.3.1		1 Technical	This is a "General" section related to safety. This does not need to be a "Shall" in API 510. This section is reminding inspectors that it is their responsibility to be safe and follow practices, not adding API 510 safety requirements.	Basis for negative - Remove "Shall" and revert back to "is responsible". I would actually be ok with removing a lot of the content in this section as well	Accepted
287	Christopher Archie	Negative	5.4	5.4.1	General	Why is the RP being deleted across the document? For consistency, in this paragraph it is not being deleted in API RP 571 as it is in other places. It was deleted in the previous paragraph, 5.3.2. It was also note deleted in the following paragraphs referencing RP documents: 3.1.15, 4.1.6, 5.5.6.5, 5.8.7.1, 6.6.3.3, 8.4.1,		Noted. To conform with the API style guide. All references to RP have been removed.
288	Christopher Archie	Negative	5.4	5.4.1	General	Why is the RP being deleted across the document? For consistency, in this paragraph it is not being deleted in API RP 571 as it is in other places. It was deleted in the previous paragraph, 5.3.2. It was also note deleted in the following paragraphs referencing RP documents: 3.1.15, 4.1.6, 5.5.6.5, 5.8.7.1, 6.6.3.3, 8.4.1,		Noted. Duplicate comment.
289	Brian Boss	Negative	5.4	all	Technical	Keep example list of Damage modes/mechanisms	Can be updated in format for readability, but leave in concept.	Noted ME to determine appropriate action ME: move list to API 572
290	Adam Keown	Negative	5.4.1		1 General	The new phase added to the 3rd sentence doesn't sound right. Need to reword to not use the verb "describe" twice.	Proposed rewording. "API 571 describes common damage mechanisms providing details on morphology and critical factors for occurrence, and inspection techniques to identify them."	Noted ME to determine appropriate action ME: Accepted
291	Ibrahim Kodssi	NonVoter	5.4.1	5.4.1	Technical	Add "Moreover, inspectors should consult CCDs or a corrosion engineer." to the end of the paragraph.	Add "Moreover, inspectors should consult CCDs or a corrosion engineer." to the end of the paragraph.	Noted ME to determine appropriate action ME: accepted in principle
292	Christopher Archie	Negative	5.4.3	5.4.3	Technical	Remove "and more damage mechanisms concerning corrosion, cracking, etc.," The list of damage mechanisms that was above this paragraph was removed which makes "and more damage mechanisms concerning corrosion, cracking, etc" irrelevant.	5.4.3 More detailed information including critical factors, appearance, and typical inspection and monitoring techniques can be found in API RP 571. Additional recommended inspection practices for various damage mechanisms are described in API RP 572.	Accepted
293	Christopher Archie	Negative	5.4.3	5.4.3	Technical	Remove "and more damage mechanisms concerning corrosion, cracking, etc.," The list of damage mechanisms that was above this paragraph was removed which makes "and more damage mechanisms concerning corrosion, cracking, etc" irrelevant.	5.4.3 More detailed information including critical factors, appearance, and typical inspection and monitoring techniques can be found in API RP 571. Additional recommended inspection practices for various damage mechanisms are described in API RP 572.	Noted. Duplicate comment.

294	Christopher Archie	Negative	5.4.4	5.4.4	Editorial	Add a period after the second sentence. It was missed in the cut and paste when the sentence was moved from the bottom of that section.		accepted
295	Christopher Archie	Negative	5.4.4	5.4.4	Editorial	Add a period after the second sentence. It was missed in the cut and paste when the sentence was moved from the bottom of that section.		Noted. Duplicate comment.
296	Cynthia Landry	AffirmativeWithComment	5.4.4	Last sentence	Editorial	Missing period	Add a period at the end of the added sentence.	accepted
297	Cynthia Landry	AffirmativeWithComment	5.4.4	New sentence	Editorial	Missing period	Add a period at the end of the added sentence.	accepted
298	Michael Schmidt	NonVoter	5.4.4	1st paragraph, 2nd sentence	Editorial	Add a period after pressure swing adsorbers to end the sentence		accepted
299	Robert Sladek	NonVoter	5.4.4	P1, S2	Editorial	Use formal terminology: "molecular" sieves. Need a period at the end of the sentence to not confuse it with the next sentence.	Change "mole sieves" to "molecular sieves" and add a period after adsorbers	accepted
302	Christopher Archie	Negative	5.4.6	5.4.6	Technical	All the pressure vessels have the risk of brittle fracture during start-up and shut-down cycles, depending on thickness and materials of construction. MAT determination for vessels in hydrogen service is now provided in API 579 Annex 9J.	Reword to say: "Pressure vessels should have minimum allowable temperature (MAT) and operating procedures established to minimize the potential for brittle fracture during heat up and cool down cycles. The impact of hydrogen service should be considered during MAT calculations. See API 579-1/ASME FFS-1 Annex 9J for guidance."	Noted future discussion needed
303	Christopher Archie	Negative	5.4.6	5.4.6	Technical	All the pressure vessels have the risk of brittle fracture during start-up and shut-down cycles, depending on thickness and materials of construction. MAT determination for vessels in hydrogen service is now provided in API 579 Annex 9J.	Reword to say: "Pressure vessels should have minimum allowable temperature (MAT) and operating procedures established to minimize the potential for brittle fracture during heat up and cool down cycles. The impact of hydrogen service should be considered during MAT calculations. See API 579-1/ASME FFS-1 Annex 9J for guidance."	Noted. Duplicate comment.
300	Michael Schmidt	NonVoter	5.4.6	1st paragraph, last sentence	Editorial	revise 2.25 chrome to 2 1/4 Cr-1 Mo alloys		accepted
301	Cynthia Landry	AffirmativeWithComment	5.4.6	Last sentence	Editorial	Reword	Missing parenthesis? (see API 934 F, Part 3 contains details on 2.25 chrome.)? Not sure that is what the writer is trying to reference.	Reject. This is a separate sentence.
305	Michael Schmidt	NonVoter	5.5.1	Sub paragraph a) & c)	Technical	Consider revising for consistency with the definition of inspections.	Consider revising to: "a) internal visual inspectionb) external visual inspection"	Noted ME to determine appropriate action ME: reject - will keep the verbiage similar to the following sections. Also, internal can be more than just visual.

304	Leslie Ward	Negative	5.5.1	1st	Technical	Consider changing item e) CUI/CUF inspection to e) CUI/CUF/ECSCC inspection	Change item e) to state: "e) CUI/CUF/ECSCC inspection"	Accepted
308	Michael Schmidt	NonVoter	5.5.2.1	1st sentence of 1st paragraph	Technical	Consider revising the first sentence to internal visual inspection for consistency		Noted ME to determine appropriate action ME: reject, the internal can be more than just visual
309	Michael Schmidt	NonVoter	5.5.2.1	1st sentence of last paragraph	General	Consider revising the first sentence to internal visual inspection for consistency. Also consider adding language suggesting the use of internal visual inspection when internal damage mechanisms cannot be adequately monitored using non-intrusive inspection techniques	Consider revising the sentence as follows: "A primary goal of the internal visual inspection is to find damage that cannot be found by regular monitoring of external condition-monitoring locations (CMLs) during on-stream inspections or that cannot be adequately monitored using non-intrusive NDE techniques."	Accepted
311	Matt Caserta	Negative	5.5.2.1	1st paragraph	Technical	2nd sentence uses "check." Check is not a defined inspection term in API 510.	Change "check" to "examination"	Accepted
313	Edward Sanchez	Negative	5.5.2.1	P1, S2	General	Should "a check" be changed to "an examination"?	Consider changing "a check" to "an examination."	Accepted
310	David Wang	Negative	5.5.2.1	1st para, 5th sentence	Technical	It is not clear what the sentence mean. Does it mean that the inspector shall be standing next to the vessel during remote visual inspection of the vessel? What is the point of "remote" when the inspector must be standing next to the vessel? The inspector should be responsible for reviewing and accepting the data from the remote inspection, but not necessarily being present during the inspection.	The inspector shall be responsible for reviewing and accepting the data from these inspection techniques.	accepted ME: accepted in principle.
312	Ibrahim Kodssi	NonVoter	5.5.2.1	5.5.2.1	Editorial	Redundant statement within the same paragraph "Remote visual inspection techniques may aid the check of internal surfaces"	Remove the redundant statement	Rejected, I am not seeing this redundancy - looked 3 times.
307	Michael Schmidt	NonVoter	5.5.2	Title	Technical	consider revising to "Pressure Vessel Internal Visual Inspection" for consistency with definitions		Noted ME to determine appropriate action ME: rejected, the internal inspection can be more than visual.
306	Jared Williamson	Negative	5.5.1.3	1st paragraph	Editorial	Incorrect word: "authorized / approved by the inspection and owner-operator."	Should be "inspector" not "inspection"	Rejected, I am not seeing this - looked 3 times.
314	David Wang	Negative	5.5.3.2	2nd sentence	Technical	If an inspection is performed externally from outside of a vessel in lieu of internal inspection but it is done when the vessel is down (e.g., during T/A), is the inspection considered an on-stream inspection or not?	Replace "on-stream inspection" with "non-intrusive inspection".	noted, voted in Anaheim to use OSI
315	Brian Boss	Negative	5.5.3.2	all	Technical	do not remove section on limitation	leave as original wording	Accepted leave in limitations

319	Joseph Krynicki	Negative	5.5.4.1.2	first	Editorial	Reword second "visual inspection" wording, because it the point is using more than the "unaided eye".	include wording in CAPS: using AIDED visual inspection techniques	Not Accepted
323	Leslie Ward	Negative	5.5.4.1.3	1st	Editorial	In the second sentence, remove the spaces before and after the / where "authorized / approved" is written. Change the word inspection to inspector.	Change the second sentence to state: "It shall be performed by qualified personnel in compliance with applicable regulations and authorized/approved by the inspector and owner-operator."	Accepted
317	Abhishek Gupta	NonVoter	5.5.4	5.5.4.1.3, line 2	Editorial	Do not see RPAS described before in the document. Better to expand the abbreviation.	Remotely Piloted Aircraft Systems (RPAS)	Accepted in principle. Spelled out RPAS. ME: added here and also in Acronyms 3.2
318	Joseph Krynicki	Negative	5.5.4.1.2	first	Editorial	Define "rpas"	Define "rpas"	Accepted in principle. Spelled out RPAS.
320	Ibrahim Kodssi	NonVoter	5.5.4.1.3	5.5.4.1.3	Editorial	define rpas	define rpas	Accepted in principle. Spelled out RPAS.
321	Brian Boss	Negative	5.5.4.1.3	all	Technical	what is rpas? Add definition/acronym	define rpas	Accepted in principle. Spelled out RPAS.
322	Leslie Ward	Negative	5.5.4.1.3	1st	Editorial	In the first sentence, change rpas to RPAS. Add a comma after pressure vessel.	Change the first sentence to state: "External visual inspections may be performed remotely over parts or the entire pressure vessel, where access is limited or non-existent, using visual inspection techniques (e.g., robotic crawlers, RPAS/drones)."	Accepted in principle. Spelled out RPAS.
324	Leslie Ward	Negative	5.5.4.1.3	1st	Editorial	In the third sentence, change when use rpas/drones to ...when using RPAS/drones, ..."	Change the third sentence to state: "In addition, when using RPAS/drones, the route/trajectory must strictly follow the flightplan registered in the local air traffic control system (if applicable) and/or permission from the responsible operating personnel."	Accepted
326	Darryl Godfrey	Negative	5.5.4.1.3	P1	Editorial	rpas not defined as an acronym	Add RPAS - Remotely Piloted Aircraft System to acronyms	Not accepted. Just spelled it out in the text.

325	Ken Min	Negative	5.5.4.1.3	1st Para	Technical	Need to clarify that even if inspection is done remotely - an API 510 inspector must review the condition, not just by the qualified equipment operator.	Add 3rd sentence. Even when the inspection is performed using remote techniques, the inspection results shall be reviewed and accepted by the Inspector.	Accepted in principle:5.5.4.1.3 External visual inspections may be performed remotely over parts or the entire pressure vessel, where access is limited or non-existent, using visual inspection techniques (e.g., robotic crawlers, remotely piloted aircraft systems/drones). It shall be performed by qualified personnel in compliance with applicable regulations and authorized/approved by the inspection and owner-operator. In addition, when using remotely piloted aircraft systems/drones, the route/trajectory must strictly follow the flight plan registered in the local air traffic control system (if applicable) and/or permission from the responsible operating personnel. The completed inspection shall be submitted to the inspector for approval.
327	Ibrahim Kodssi	NonVoter	5.5.4.1.4	5.5.4.1.4	Editorial	Move to 5.5.4.1.2	Move to 5.5.4.1.2	Rejected
328	Ibrahim Kodssi	NonVoter	5.5.4.2	5.5.4.2	Technical	Move paragraphs related to inspection intervals to 6.4	Move paragraphs related to inspection intervals to 6.4	Accepted
330	Robert Sladek	NonVoter	5.5.4.2	P1, S2	Technical	We currently list an inspection interval requirements in the "Types of inspection", Section 5 instead of the Inspection intervals, Section 6. Also, change "shall" to "may" since it CP is optional.	Move this sentence and the list to Section 6.4 and edit as follows:For buried vessels or components, the external inspection interval MAY be based on the performance of the cathodic protection (CP) system, if present, and corrosion rate data obtained from one or more of the following sources:a)representative portions of the actual vessel;b)a vessel defined to be in similar service;c)inferential corrosion monitoring of connected piping with the same design (material, coatings, current density, etc.);d)the periodic examination of similarly buried corrosion testcoupons of like material.	Accepted
329	Edward Sanchez	Negative	5.5.4.2	Listing	Editorial	The word "from" is in the introductory paragraph so there is no need to repeat it in the four bullets.	Remove the word "from" from the 4 bullets.	Accepted
316	Michael Schmidt	NonVoter	5.5.4	Title	Technical	consider revising to "External Visual Inspektion of Pressure Vessels" for consistency with definitions		Noted ME to determine appropriate action. ME: accepted

335	Christopher Archie	Negative	5.5.5	5.5.5.1	Technical	Remove this sentence. I'm not sure what that adds to the requirement, but could be interpreted by auditors that any established CML should be included in the survey whether they are active or not. A basis of NEGATIVE vote.	Remove 5.5.5.1	Accepted
337	Christopher Archie	Negative	5.5.5	5.5.5.1	Technical	Remove this sentence. I'm not sure what that adds to the requirement, but could be interpreted by auditors that any established CML should be included in the survey whether they are active or not. A basis of NEGATIVE vote.	Remove 5.5.5.1	Noted. Duplicate comment.
339	Adam Keown	Negative	5.5.5		1 Technical	Why is there a need to come up with a new term "Thickness Examination Survey"? This isn't defined or called out as a required inspection, so this needs more definition before we use this or 5.5.5.1 (New)	Proposed change, "5.5.5.1 A thickness examination survey shall include all required and established CMLs on the pressure vessel as well as any additional thickness readings to quantify corrosion found during scheduled inspections."	5.5.5.1 Removed with Sort Key 335
340	Darryl Godfrey	Negative	5.5.5	P1	Technical	BASIS for NEGATIVEIt is not necessary to survey all required and established CMLs. Established CMLs showing no significant deterioration may be excluded from a thickness examination survey.5.5.5.1 A thickness examination survey shall include all required and established CMLs on the pressure vessel."	Modify to readA thickness examination survey should include the required CMLs and selected established CMLs on the pressure vessel, as defined in the inspection plan.	5.5.5.1 Removed with Sort Key 335
341	Ray Konet	Negative	5.5.5.1	1s	Technical	Not sure why a survey shall be done on all required and established CMLs. That is not a required practice nor is it justified.	Negative: Delete new words.	5.5.5.1 Removed with Sort Key 335
342	Grady Hatton	Negative	5.5.5.1	1st sentence	Technical	You may have dozens of CMLs but you do not have to perform thickness examination at all the CMLs.	Basis for Negative - Thickness examination survey should include the required CMLs as stated in the inspection plan.	5.5.5.1 Removed with Sort Key 335
343	Tony Poullassichidis	Negative	5.5.5.1	5.5.5.1	Technical	Text requires all required CMLs on a pressure vessel to be part of thickness survey.	Replace with should, inspection could select scope for thickness survey.	5.5.5.1 Removed with Sort Key 335
344	Joseph Krynicki	Negative	5.5.5.1	first	General	what are "established" cmls? The number and location may vary over time.	CHANGE TO: A thickness examination survey shall HAVE established CMLs on the pressure vessel."	5.5.5.1 Removed with Sort Key 335
345	Terry Blue	Negative	5.5.5.1	1st sentence	Technical	CMLs may be established at numerous locations, but this does not imply that all such locations must be monitored. The use of the terms "shall" and "all" is therefore inappropriate in this context.	Basis of Negative - A thickness examination survey should include the required CMLs and selected established CMLs on the pressure vessel, as defined in the inspection plan.	5.5.5.1 Removed with Sort Key 335
346	Ibrahim Kodssi	NonVoter	5.5.5.1	5.5.5.1	Technical	add the following to the end of the sentence "unless justified by RBI."	add the following to the end of the sentence "unless justified by RBI."	Not accepted due to other edits on this section
347	Jared Williamson	Negative	5.5.5.1	1st paragraph	General	Not every inspection will include all established CMLs. If we leave as is, it indicates that the inspector and owner would be in violation if they chose to not inspect every CML marked on the vessel, ISO, and/or IDMS.	Remove the word "established" as some CMLs may not require inspection everytime.	5.5.5.1 Removed with Sort Key 335

348	Ken Min	Negative	5.5.5.1	1st Para	Technical	CMLs are not all related to thinning damage so requiring all CMLs be included in a thickness examination survey will lead to over inspection.	Section should read "A thickness examination survey shall include all required and established thickness CMLs on the pressure vessel."	Noted other changes affect this section
349	Mark Geisenhof	Negative	5.5.5.1	all	Technical	There should not be a requirement to survey all required and established CML's.	Basis of negative-Delete new text for 5.5.5.1 in it's entirety	5.5.5.1 Removed with Sort Key 335
350	Brian Boss	Negative	5.5.5.1	all	Technical	TM exam does not require all CMLs to be inspected, it is per the plan and defined by the O-O.	remove	Noted other changes affect this section
351	Matt Caserta	Negative	5.5.5.1	first sentence	Technical	BASIS FOR NEGATIVE - This new statement introduces a "required CML." It is unclear what makes a CML "required." I don't see an issue with doing an thickness survey on a pressure vessel and selecting specific CMLs of concern. When using RBI, it is common to only do a percentage of CMLs based on risk, not every CML every inspection.	Remove this new sentence.	5.5.5.1 Removed with Sort Key 335
352	Adam Keown	Negative	5.5.5.1 (New)	1	Technical	Section 5.5.5.1 (new) needs to include information beyond just CML readings	Proposed change, "5.5.5.1 A thickness examination survey shall include all required and established CMLs on the pressure vessel as well as any additional thickness readings to quantify corrosion found during scheduled inspections."	5.5.5.1 Removed with Sort Key 335
353	Terry Blue	Negative	5.5.5.2	Last sentence	Technical	Disagree with the word "should". Instead use the word "may".	Replace "should" with "may".	Noted ME to determine appropriate action. ME: could not find a "should" in the referenced section. Assume you meant 5.5.5.3 P1S2 which is now removed
331	Abhishek Gupta	NonVoter	5.5.5	5.5.5.3 line 2	Editorial	ERROR	replace "is the primary method for" with "helps"	Rejected - disagree
332	Abhishek Gupta	NonVoter	5.5.5	5.5.5.3 line 2	Technical	ERROR	after "monitoring corrosion rates", add: 'and provide early indication of damage, where possible.'	Rejected
333	Abhishek Gupta	NonVoter	5.5.5	5.5.5.3 line 4	Technical	ERROR	replace "from the external" with "for on-stream thickness monitoring"	rejected
354	Jared Williamson	Negative	5.5.5.3	Last sentence	General	"Thickness measurements should be performed during internal inspections near damaged areas to quantify remaining thickness and for components (e.g., nozzles) and locations (e.g., bottom head) deemed inaccessible from the external."This is already stated in 5.7.2.1 and 5.7.2.1(b). No need to add it here too.	Remove this entire sentence.	Accepted
355	Michael Schmidt	NonVoter	5.5.5.3	2nd sentence	Technical	Consider revising to internal visual inspections for consistency with definitions		Noted ME to determine appropriate action sentence removed with SK354

356	Darryl Godfrey	Negative	5.5.5.3	P1S2	Technical	'at' rather than 'near'. For localised corrosion near may not capture the thinnest reading.	Replace 'near' with 'at'.	Noted ME to determine appropriate action sentence removed with SK354
357	Darryl Godfrey	Negative	5.5.5.4	P1	Technical	Not worded very well and needs revision.API 570 Section 5.6.2 is much better written and describes CML allocation consideration.	Delete this paragraph and rewrite this paragraph based on API 570 Section 5.6.2 text modified for vessel specific requirements.	reword and put under 5.6.3 ME: used wording from SK363 and located as the first paragraph under 5.6.3
358	Brian Boss	Negative	5.5.5.4	all	Technical	There is so much behind the selection of CMLs. Reference to 572 or another source of this would be appropriate. Not here	leave as original wording.	reword and put under 5.6.3
359	Ken Min	Negative	5.5.5.4	1st Para	Technical	The section 5.5.5 refers directly to thickness examination surveys, yet this subsection is discussing CML placement methodology and recommendations. This appropriately includes information about cracking and other damage mechanisms considerations, but this is not relevant to "Thickness Examination Surveys" since CMLs are no longer specifically for tracking thickness.	CML placement methodologies should be placed in a standalone sub-section of 5.6 and referenced in 5.5.5.4 stating that "CMLs for thinning damage should be strategically placed in accordance with section 5.6.x.y."	reword and put under 5.6.3
360	Jared Williamson	Negative	5.5.5.4	1st paragraph	General	This information is basically already in 5.6.3. No need to add it here too.	If more detail is needed in 5.6.3, then we can modify that section.	reword and put under 5.6.3
361	Ibrahim Kodssi	NonVoter	5.5.5.4	5.5.5.4	Editorial	move to 5.6	move to 5.6	accepted
362	Ibrahim Kodssi	NonVoter	5.5.5.4	5.5.5.4	Editorial	move to 5.6	move to 5.6	Noted. Duplicate comment.
363	Terry Blue	Negative	5.5.5.4	Paragraph	Technical	This paragraph is needlessly verbose and informative. If treated as a requirement in API 510, this text would introduce guidance style, subjective language into a prescriptive code, creating obligations that cannot be objectively verified or consistently enforced. It relies on non measurable concepts such as "strategic placement," "prioritization," and "high risk areas," duplicates intent already addressed through inspection planning and damage mechanism identification, and shifts toward outcome based expectations rather than clear, auditable actions. As a result, it would increase compliance ambiguity and retrospective enforcement risk without providing additional technical control or safety benefit, making it more appropriate for a guidance document or informative annex rather than normative code text.	Change to: CMLs should be selected and located based on the credible damage mechanisms identified for the pressure vessel and the inspection methods specified in the inspection plan. Selection of CMLs shall consider operating conditions, materials of construction, and relevant inspection history, as applicable.	reword and put under 5.6.3
364	Adam Keown	Negative	5.5.5.4 (New)	1	General	Section 5.5.5.4 (new) should be included in section 5.6 since this is just referencing CML's versus thickness examination surveys	Move under 5.6.3 CML Selection and Placement	reword and put under 5.6.3

365	Terry Blue	Negative	5.5.5.5	Sentence 1 and 2	General	There are 14 instances of the term “significant,” or its variants, despite Annex G of the style guide requiring requirements to be stated using unambiguous language.	Determine how to reconcile this with the style guide requirements.	I did this (removed almost all instances of the word). But you really should evaluate each of these yourself and propose an verbatim change. Or assemble a small team if the job is too big.
366	Carlos Salazar	NonVoter	5.5.5.5	paragraph	Technical	Include the word "Control" in the paragraph	5.5.5.5 The inspector shall review the results of the thickness inspection data to look for possible anomalies and should consult with a corrosion specialist when the short-term corrosion rate changes significantly from the previous identified rate to determine the cause. Appropriate responses to accelerated corrosion rates may include additional thickness readings, UT scans in suspect areas, corrosion/process CONTROL AND monitoring, and revisions to the vessel's inspection plan. Whenever corrosion rates change significantly or other unanticipated deterioration is found, an investigation should be performed. Information contained in the	Accepted
336	Christopher Archie	Negative	5.5.5	5.5.5.6	Editorial	Change "assure" in the first sentence to "ensure". Ensure means to guarantee. Assure means to promise.	The owner-operator shall ensure individuals taking thickness readings are trained and qualified as a UT TM (thickness-monitoring) examiner in accordance with the applicable procedure used during the examination.	Not Accepted
338	Christopher Archie	Negative	5.5.5	5.5.5.6	Editorial	Change "assure" in the first sentence to "ensure". Ensure means to guarantee. Assure means to promise.	The owner-operator shall ensure individuals taking thickness readings are trained and qualified as a UT TM (thickness-monitoring) examiner in accordance with the applicable procedure used during the examination.	Noted. Duplicate comment.
367	Terry Blue	Negative	5.5.5.6	1st sentence	Technical	4.6.3 has an overlapping requirement.	There is repeated text. Keep only 1 and switch to "verify" instead of "assure" or "shall".	Accepted in Principle ME to update as appropriate
368	Christopher Archie	Negative	5.5.5.6	5.5.5.6	Editorial	The first sentence is a duplicate of the first sentence in 4.6.3.	Delete the first sentence of 5.5.5.6 or the first sentence in 4.6.3.	Not Accepted
369	Christopher Archie	Negative	5.5.5.6	5.5.5.6	Editorial	The first sentence is a duplicate of the first sentence in 4.6.3.	Delete the first sentence of 5.5.5.6 or the first sentence in 4.6.3.	Noted. Duplicate comment.
370	Robert Sladek	NonVoter	5.5.5.6	P1, S1	Technical	This sentence is redundant to 4.5.3 P1, S1	Remove first sentence here and keep it in 4.5.3.	Accepted in Principle ME to update as appropriate

371	Adam Keown	Negative	5.5.5.6 (New)	1	Technical	Owner-operators are responsible for all aspects of inspections on their equipment, but require them to assure the training and qualifications of contract technicians is not their responsibility. They should be checking this, but it is ultimately the responsibility of the examiner's employer.	Basis for negative - revert to "is responsible" and remove "shall"	Accepted
334	Abhishek Gupta	NonVoter	5.5.5	5.5.5.7 and 5.5.5.8	Technical	ERROR	Suggest these two bullets to be moved under 5.6.3 CML selection and placement.	noted affected by other edits. See SK375 and 376
372	Terry Blue	Negative	5.5.5.7	Sentence 1	General	There are 14 instances of the term "adequate," or its variants, even though Annex G of the style guide requires requirements to be stated using unambiguous language.	Determine how to reconcile this with the style guide requirements.	Accepted in Principle ME to update as appropriate
373	Ahmad Raza Khan Rana	NonVoter	5.5.5.7	1	Technical	The statement is not inclusive of the insulation inspection underneath CML plugs (which can be easily done at the time of inspection through CML plugs). Also, this statement does not address specific CML related cautions for the pressure vessels operating at below-ambient temperatures	Regarding CMLs on insulated vessels, care should be taken so that CML sealing systems, e.g., CML plugs, are kept in place to provide adequate sealing of insulation covers to avoid ingress of moisture that could cause CUI. After inspections, ensure the reinstatement of insulation underneath the CML plugs. Also, inspect the insulation segments right underneath the CML plug for the tell-tale signs of moisture infiltration. For the vessels operating at below-ambient temperatures, in addition to ensuring the sealing systems (i.e., CML plugs) ensure that there is no cold transfer or icing formation at/ around CML plugs.	Not Accepted
374	Ahmad Raza Khan Rana	NonVoter	5.5.5.7	1	Technical	CMLs (low profile/ height designs) can also be installed on the vessels applied with Thermally insulative coatings (TIC). So i would suggest adding another bullet point e.eg., 5.5.5.9 or so on	5.5.5.9 - For the CML on the TIC applied vessels, care should be taken so that CML sealing systems, e.g., CML plugs, are kept in place to provide adequate sealing of insulation covers to avoid ingress of moisture that could cause CUI.	Not Accepted
375	Adam Keown	Negative	5.5.5.7 (New)	1	General	Section 5.5.5.7 (new) should be included in section 5.6 since this is just referencing CML's versus thickness examination surveys	Move under 5.6.3 CML Selection and Placement	Noted ME to determine appropriate action. Moved to section 5.6.3.3
376	William Martin	Negative	5.5.5.8	1	Technical	This is over conservative and unnecessary in many cases and should not be a requirement.	Do not add. Reason for negative vote.	Removed

377	Jared Williamson	Negative	5.5.5.8	1st paragraph	General	Why? Owner / inspector/engineer should determine where they need their CMLs. We do not need to get too detailed in giving exact descriptions of where CML points must be located. The principle is given in 5.6.3. The owner, inspector, engineer, & corrosion specialist should manage this, not this code. If this is left, CMLs will then be required in locations that may not be strategic, and may result in focus being placed on wrong locations due to mandates.	Remove this paragraph/ section.	Removed
378	Adam Keown	Negative	5.5.5.8 (New)	1	General	Section 5.5.5.8 (new) should be included in section 5.6 since this is just referencing CML's versus thickness examination surveys	Move under 5.6.3 CML Selection and Placement	Accepted
381	Edward Sanchez	Negative	5.5.6.1	S1	Editorial	Remove the word "the."	Remove the word "the."	Accepted
382	Ahmad Raza Khan Rana	NonVoter	5.5.6.1	1	Technical	The recent API 583 contains the topic of insulation driven SCC. So i would suggest addressing that in this statement as well	API 583 provides detailed guidance for the design, maintenance, inspection, and mitigation practices to address external corrosion under insulation (CUI), corrosion under fireproofing (CUF), Insulation driven stress corrosion cracking (SCC) and the external chloride stress corrosion cracking (ECCSC).	Rejected covered in API 583
384	Robert Sladek	NonVoter	5.5.6.2	P1, S1	Technical	We have defined "intermittent". Every instance it is used in the Code is either "intermittent/noncontinuous" or noncontinuous/intermittent".	1) Change defined term 3.1.46 from "intermittent" to "intermittent service"2) remove "noncontinuous" throughout.	Need to look at Chris Archie comment to add the noncontinuous/intermittent. Since the definition is for intermittent and includes the synonym noncontinuous, I changes all occurrences to intermittent.
388	Darryl Godfrey	Negative	5.5.6.2	P1S1	Technical	remove "noncontinuous" as intermittent is defined and includes noncontinuous services.	delete "noncontinuous" where combined with intermittent such as "intermittent/noncontinuous" and/or replace "noncontinuous" with "intermittent" throughout the document	Noted no change for next ballot (may become an ME task) Accepted in principle. See SK 384
383	Michael Schmidt	NonVoter	5.5.6.2	2nd to the last paragraph	General	Consider re-writing this paragraph form consistency with defined terminology (use of "vessels that are in downtime" vs. idled) and for better readability.	Consider revising as follows: "This is particularly relevant for carbon steel (CS) and low alloy steels. Vessels that are placed in an idled condition can become susceptible to CUI due to the ingress of moisture. Equipment idled for a prolonged period due to the extension of shutdowns (SD) or turnarounds (TAs) is also at risk of CUI."	Noted ME to determine appropriate action. Edited per SK 385
385	Robert Sladek	NonVoter	5.5.6.2	P2	Technical	Overall, not convinced this belongs in 510 vs 572. Likely already in 572. Not sure the term "downtime" works as written here. Drop the "It has been observed in the industry". Combine first 3 sentences into 1 and drop the last sentence since it is redundant. Rewrite as proposed.	"Insulated carbon and low-alloy steel vessels are particularly susceptible to CUI during downtimes due to water/moisture entrapment which often results in accelerated corrosion at ambient temperatures."	Noted See SK 383 and edit

387	Jared Williamson	Negative	5.5.6.2	2nd paragraph	Editorial	"It has been observed in the industry that CUI is applicable/susceptible to vessels that are in downtime for a certain period due to the ingress of moisture." CUI is not susceptible, the vessel is.	Remove the word susceptible or reword sentence.	not accepted
389	Darryl Godfrey	Negative	5.5.6.2	P2	Technical	Poorly worded. Poorly worded. What is particularly relevant?? Abbreviations after shutdowns or turnarounds not needed. Vessels that are in downtime for an extended period, as a result of batch operations or extension of shutdowns, may be susceptible to CUI due to the ingress of moisture during the downtime.	Replace with Vessels that are in downtime for an extended period, as a result of batch operations or extension of shutdowns, may be susceptible to CUI due to the ingress of moisture during the downtime.	Noted See SK 383 and edit
391	Adam Keown	Negative	5.5.6.2 (New)	3 (Middle new paragraph)	Technical	Need to specify and simplify this editorial comment. The comment is good, but doesn't specify that this is referring to the intermittent/noncontinuous service aspects.	Proposed update, "Consideration for externally insulated vessels that are carbon or low alloy steels and intermittently in the CUI temperature range listed above are particularly relevant. It has been observed in industry that ingress of water or moisture under the insulation can occur during prolonged equipment downtimes and lead to CUI corrosion."	Noted See SK 383 and edit
386	Robert Sladek	NonVoter	5.5.6.2	P3, S1	Editorial	Reference to API 583 is not necessary here. Remove	"...go in and out of the CUI range. "	accepted
390	Darryl Godfrey	Negative	5.5.6.2	P3	Technical	delete addition "of noninsulated and or partially insulated" as not relevant to CUI section if not insulated and dilutes focus on insulated penetrations.	delete "of noninsulated and or partially insulated"	I butchered this one up but it makes the point a lot cleaner.
392	Terry Blue	Negative	5.5.6.3	3rd para	Technical	Why are we mentioning noninsulated equipment in a CUI section?	Delete "of noninsulated and or"	See SK390
394	Robert Sladek	NonVoter	5.5.6.3	P2, S1	Technical	Add "progressively" to the sentence and if CUI damage is found, the inspector should determine the limits of the damage.	If CUI damage is found, the inspector should PROGRESSIVELY inspect THE DAMAGED AREA UNTIL THE EXTENTS ARE KNOWN AND INSPECT other susceptible areas on the vessel	Accepted
407	Brian Boss	Negative	5.5.6.4	all	Technical	Unnecessary new requirements - specifying criticality of insulation being critical, applying time and specifying shalls for replace in kind. All this is unnecessary.	leave as original wording.	Accepted in Principle
395	Robert Sladek	NonVoter	5.5.6.4	P1, S2	Technical	Using i.e., when you should be using e.g., "Removing selected windows in the insulations" is not a clarification of removing all insulation.	"CUI inspection may require removal of some or all insulation (E.G., removing selected windows in the insulation). "	Accepted Editorial
396	Robert Sladek	NonVoter	5.5.6.4	P1, S3	Technical	This is repeated in the new P4	Remove sentence	Rejected : SK407 was to revert to original

397	Robert Sladek	NonVoter	5.5.6.4	P1, S5	Technical	"will depend on the risk of an incident" implies that RBI or a risk assessment shall be used for CUI. If that is the case, we should be more direct in what we are saying.	I recommend we delete this sentence and add "amount" to P2, S1 (see comment). OR Maybe replace with "The amount of insulation to remove may be established from a risk assessment."	Rejected : SK407 was to revert to original
403	Michael Schmidt	NonVoter	5.5.6.4	last sentence of 1st paragraph	Editorial	Remove capitalization of the work Considerations.		Rejected - this was a formatting issue in the last ballot.
409	Scott Sinclair	Negative	5.5.6.4	1st paragraph	Editorial	Last sentence states "For locations where insulation is not removed," and the rest of the sentence was struck through. So this is an incomplete sentence.	Remove sentence fragment	ME corrected
398	Robert Sladek	NonVoter	5.5.6.4	P1, S6	Editorial	Due to editing, this sentence is incomplete. This was moved to P4	Remove "For locations where insulation is not removed, "	ME corrected
399	Robert Sladek	NonVoter	5.5.6.4	P2, S1	Editorial	Adding "amount and location(s)" of insulation to remove if deleting P1, S4	"Considerations on the need for insulation removal AND THE AMOUNT AND LOCATION(S) OF INSULATION TO REMOVE are not limited to but include:"	accepted in principle
410	Scott Sinclair	Negative	5.5.6.4	g)	Technical	States "potential for the type of insulation to absorb/hold more water (e.g., calcium silicate vs cellularglass);" API standards should be material agnostic.	Remove example in parenthesis "(e.g., calcium silicate vs cellularglass)"	Accepted
405	Ahmad Raza Khan Rana	NonVoter	5.5.6.4	j	Technical	I would suggest adding moisture egress design as "j" an evaluation consideration for CUI to align with API 581 and API 583 (as this is something already touched in API 581 and API 583)	Presence of moisture egress design (e.g., low point drainage, insulation drying systems, and leachate barriers)	the addition is good information but I think it is already covered with C and D
400	Robert Sladek	NonVoter	5.5.6.4	P3, S1	Technical	This method can be complimentary and not just a alternative. Remove "Alternatively,". Split into 2 sentences and replace "may" with "can".	"Shell thickness measurements done internally at typical CUI problem areas may be performed during internal inspections. The inspector should be aware CUI damage is often highly localized and therefore CAN be difficult to detect from the inside diameter of a vessel."	Accepted DJR (should this be a warning or caution statement)
402	Robert Sladek	NonVoter	5.5.6.4	P4, S2	Technical	I think the point here is that NDE may be used to detect CUI/CUF without the removal of insulation. OR is this a qualifier stating that if insulation is not removed, you should use NDE to confirm?	"NDE methods to detect CUI/CUF without insulation removal may be used in accordance with API 583."	Rejected : SK407 was to revert to original – Accepted DJR
404	Michael Schmidt	NonVoter	5.5.6.4	2nd paragraph	Editorial	Consider removing the word "diameter" from the sentence after the word inside.		Accepted in principle
379	Christopher Archie	Negative	5.5.6	5.5.6.4	Editorial	Remove all of the last sentence. Only part was removed with the redline. Without the last part, the first part doesn't make any sense.		ME corrected

380	Christopher Archie	Negative	5.5.6	5.5.6.4	Editorial	Remove all of the last sentence. Only part was removed with the redline. Without the last part, the first part doesn't make any sense.		Noted. Duplicate comment.
411	Ibrahim Kodssi	NonVoter	5.5.6.4	5.5.6.4	Editorial	The following is redundancy remove, redundant with the first paragraph in 5.5.6.4."If external coverings are in good condition and there is no reason to suspect damage behind them, it is not necessary to remove them for inspection of the vessel. For locations where insulation is not removed, API 583 provides guidance on NDE methods that can be applied to detect CUI/CUF under insulation."	Remove the redundant section.	Not redundant, this was moved to the new paragraph. Poor formatting on previous ballot.
401	Robert Sladek	NonVoter	5.5.6.4	P4, S1	Editorial	"external coverings" or "insulation system"? And "underneath" instead of "behind".	"If THE INSULATION SYSTEM IS in good condition and there is no reason to suspect damage UNDERNEATH, it is not necessary to remove IT for inspection of the vessel."	Accepted
408	Joseph Krynicki	Negative	5.5.6.4	last	General	Timing may not be justified and why replace "poor insulation" (e.g., mineral wool) when better types are available.	Change shall to should: Replacement of all insulation and weather jacketing removed for the purpose of CUI inspection is critical and SHOULD shall be performed in the shortest possible timeframe following removal. Material of the same type, thickness and layering SHOULD shall be installed. Care shall be taken to ensure proper watershed of all weather jacket materials.	noted Reverting to original language due to other comment SK407 ME: paragraph 5 removed.
414	Darryl Godfrey	Negative	5.5.6.4	P5	Technical	The language makes it difficult to audit compliance. What is 'shortest possible timeframe'. Replace 'shalls' with 'should'. Delete second sentence as insulation may be upgraded. Replacement of insulation and weather jacketing removed for the purpose of CUI inspection should be completed prior to returning the equipment to service. Replacement materials should be of the same type, thickness, and layering as the original installation. Weather jacketing should be installed to maintain proper water shedding.	Replace 'shalls' with 'should'. Replacement of insulation and weather jacketing removed for the purpose of CUI inspection should be completed prior to returning the equipment to service. Weather jacketing should be installed to maintain proper water shedding.	ME: paragraph 5 removed
415	Adam Keown	Negative	5.5.6.4 (New)	5 (Last new paragraph)	Technical	Why is there a need to specify the timeframe using "critical" and "shall" for replacing insulation and weather jacketing on a CUI inspection? Also, why is there a requirement to re-install the same type, thickness, and layering for the insulation?	Basis for Negative - Delete this paragraph	ME: paragraph 5 removed
416	Keneth Marden	Negative	5.5.6.4 Insulation Removal	Last Paragraph	Technical	Replacement of insulation is critical to what? It may not be critical at all in some cases. Additionally, requiring the same type, thickness and layering replacement material with a shall statement does not allow for improvement in design or improvement in material.	Recommend that this whole paragraph be deleted. If the intent is to replace partial removal for purposes of mitigating future CUI, we should say that.	ME: paragraph 5 removed

393	Terry Blue	Negative	5.5.6.3	5th para	Technical	"Shortest possible timeframe" is inappropriate for API 510 because it is subjective, unbounded, non auditable, and enforceable only through hindsight. It shifts the code from defining clear, controllable obligations to judging perceived effort and speed, which introduces compliance ambiguity, inconsistent enforcement, and potential safety tradeoffs. While timely insulation replacement is a valid integrity concern, API 510 must express that concern through objective, verifiable requirements rather than aspirational or absolutist wording.	Basis of Negative - Replacement of insulation and weather jacketing removed for the purpose of CUI inspection should be completed prior to returning the equipment to service. Replacement materials should be of the same type, thickness, and layering as the original installation. Weather jacketing should be installed to maintain proper water shedding.	Accepted in principle (slight change) Replacement of insulation and weather jacketing removed for the purpose of CUI inspection is critical and should be completed prior to returning the equipment to service. Replacement materials should be of an equivalent the same type, thickness, and layering as the original installation. Weather jacketing should be installed to maintain proper water shedding. ME: paragraph 5 removed
406	Mark Geisenhof	Negative	5.5.6.4	5th paragraph	Technical	The shall is not necessary for this statement.	Replacement of insulation and weather jacketing removed for the purpose of CUI inspection is critical and should be performed in a timely manner following removal.	Accepted revert to original
412	Christopher Archie	Negative	5.5.6.4	5.5.6.4	Technical	Change the word "same" in the last sentence of that section to "equivalent".	Material of equivalent type, thickness and layerings shall be installed. Care shall be taken to ensure proper watershed of all weather jacket materials.	ME: paragraph 5 removed
413	Christopher Archie	Negative	5.5.6.4	5.5.6.4	Technical	Change the word "same" in the last sentence of that section to "equivalent".	Material of equivalent type, thickness and layerings shall be installed. Care shall be taken to ensure proper watershed of all weather jacket materials.	Noted. Duplicate comment.
417	Robert Sladek	NonVoter	5.5.7	NEW	Technical	I propose we mention here that insulation and fireproofing are often a crediting safeguard used in PHAs?	Add new paragraph: "Insulations systems and fireproofing are often credited as a safeguard in a unit's Process Hazard Analysis (PHA). Deficient conditions of either system should be reported to Operations. The PHA should also be updated if any insulation or fireproofing systems is permanently altered."	Rejected will draw negative
418	Adam Keown	Negative	5.6.2.1	1	Technical	What is the difference between 5.5.5 and 5.6.2? There is duplicate information and some appears to be inconsistent	Propose that information is consolidated and that we differentiate CML examination requirements from thickness examination surveys. Propose that thickness examination surveys are the act of performing an entire survey of CML's on a vessel. CML examinations section should include only the requirements for individual CML readings.	Noted for future discussion
420	Robert Sladek	NonVoter	5.6.2.3	P1, S2	Technical	"may" or "should"?	Volumetric measuring techniques also can be used to identify thin areas that SHOULD then be measured by ultrasonic techniques or radiography.	Accepted

421	David Wang	Negative	5.6.2.3	2nd sentence	Technical	It is not clear what "volumetric measuring techniques" refer to in this sentence. Normally volumetric techniques refer to UT and RT. However, the sentence says "Volumetric measuring techniques also can be used to identify thin areas that may then be measured by ultrasonic techniques or radiography." So clearly it's talking about something other than UT and RT. So what is it? Give examples to provide clarity.	Give examples of the "volumetric measuring techniques" referred to in this sentence.	Accepted in principle
419	Carlos Salazar	NonVoter	5.6.2.3	paragraph	Technical	Include the word "Confirmed" in the paragraph	5.6.2.3 Where thickness measurements are obtained at CMLs, the minimum thickness at a CML can be located by ultrasonic measurements or radiography. Volumetric measuring techniques also can be used to identify thin areas that may then be measured by ultrasonic techniques or radiography. Additionally, when localized corrosion is expected, CONFIRMED or a concern, it is important that examinations are conducted using scanning methods such as profile radiography, density radiography, scanning ultrasonic techniques, and/or other suitable NDE techniques that will reveal the scope and extent of localized corrosion. When scanning with ultrasonics, scanning consists of taking several thickness measurements at the CML searching for localized thinning.	Accepted
422	Ibrahim Kodssi	NonVoter	5.6.2.5	5.6.2.5	Technical	Add "and for historical reference" after "same CMLs."	Add "and for historical reference" after "same CMLs."	Accepted
426	Jared Williamson	Negative	5.6.3.1	1st paragraph	General	"A decision on the type, number, and location of the CMLs should consider results from previous inspections, the patterns of corrosion and damage expected, and the potential consequence of loss of containment" The redlined copy has "and the potential consequence of loss of containment" removed from the sentence.	Reinstate the deleted phrase.	Accepted
427	Michael Schmidt	NonVoter	5.6.3.1	1st sentence of 1st paragraph	Editorial	Remove the comma at the end of the sentence.		Accepted
423	Abhishek Gupta	NonVoter	5.6.3	5.6.3.1 a), line 1	Editorial	ERROR	replace "environmental emergency" with "environmental consequence"	Accepted
424	Abhishek Gupta	NonVoter	5.6.3	5.6.3.1 c)	Technical	ERROR	add to the end: "or cracking."	Accepted

425	Abhishek Gupta	NonVoter	5.6.3	5.6.3.1 1)	Technical	ERROR	replace "environmental emergency" with "environmental consequence"	Accepted in Principle : unacceptable environmental consequence
428	Robert Sladek	NonVoter	5.6.3.2	P1, S1	Technical	AS written, this paragraph implies permission to eliminate all CMLs. Is that our intent?	"The number of CMLs may be significantly reduced when..."	Rejected may draw negative
429	Robert Sladek	NonVoter	5.7.1.1	All	Technical	Not sure why we have this section when we have a robust inspection plan section 5.1 which includes everything in this section AND better.	Remove section	noted SK430 accepted to revert to original due to negative
430	Brian Boss	Negative	5.7.1.1	all	Technical	unnecessary changes	leave as original wording.	Accepted revert to original
431	Jared Williamson	Negative	5.7.1.1	NDE List	General	Why was the list of examples NDE technologies deleted?	No strong opinion, just curious why it was deleted. I don't see that it hurts anything to stay.	noted revert to original SK430
432	Ibrahim Kodssi	NonVoter	5.7.1.1	5.7.1.1	Technical	Add "refer to CCDs or" after "The inspector should"	Add "refer to CCDs or" after "The inspector should"	Rejected CCDs are not required
433	Carlos Salazar	NonVoter	5.7.1.2	paragraph	Technical	I propose to add an explanation for the reinstallation of the removed coating, insulation once the NDE is completed	Adequate surface preparation is important for proper visual examination and for the satisfactory application of anyNDE procedures, such as those mentioned above. The type of surface preparation required depends on the individual circumstances and NDE technique, but surface preparations such as wire brushing, grit or water blasting, chipping, grinding, polishing, etching, or a combination of these preparations may be required. THE REMOVED COATING OR INSULATION SHALL BE REINSTALLED AFTER THE NDE ACTIVITY IS COMPLETED.	Rejected may draw negative
434	Robert Sladek	NonVoter	5.7.1.2	All	Technical	This is guidance. Move to 572 if not already there	Move section to 572	Rejected may draw negative
435	Robert Sladek	NonVoter	5.7.1.3	All	Technical	This section is more appropriate in section 4.6 Examiners	Move to Section 4.6	Rejected may draw negative
436	Ibrahim Kodssi	NonVoter	5.7.1.3	5.7.1.3	Editorial	move to 4.6	move to 4.6	See sort key 435

437	Robert Sladek	NonVoter	5.7.2.1	P1, S1-3	Technical	replace "may" with "can". This is mostly guidance and recommend this be moved to 572 if not already there.	Corrosion CAN cause a uniform loss (a general, relatively even metal loss of a surface area) or localized loss (only occurring in specific isolated areas) or CAN cause a pitted appearance (an obvious, irregular surfacemetal loss). Uniform corrosion CAN be difficult to detect visually, so thickness measurements are usually necessary to determine its extent. Localized corrosion and pitted surfaces CAN be thinner than they appear visually, and when there is uncertainty about the original surface location or depth of metal loss, thickness determinations CAN also be necessary.	noted Editorial changes but do not move to 572 may draw negative
438	Robert Sladek	NonVoter	5.7.2.1	P1.b	Technical	Add a sentence that thickness reading should be taken in the uncorroded portions to quantify the remaining wall thickness after deducting the pit gauge readings	"Ultrasonic thickness measurments should be taken in the uncorroded region near the damage so the remaining wall thickness in the corroded region can be determined by deducting the pit measurment from the thickness reading."	need help with this one. The way I read bullet b this is what it says but might be confusing due to Gauging? ME: this new text recommend to UT the uncorroded region you are gauging from. Noted, no action this ballot
439	David Wang	Negative	5.7.2.1	c) first sentence.	Editorial	Change "vessels Proper" to "vessels, proper".	For measurements on insulated vessels, proper repair ...	Accepted
440	Michael Schmidt	NonVoter	5.7.2.1c)	1st sentence	Editorial	uncapitalize the word Proper.		Accepted
441	Denizhan GUL	NonVoter	5.7.2.4	h)	General	The term "thickness limitations" may be broader and more inclusive phrase.		Rejected not actionable
446	Brian Boss	Negative	5.7.3	all	Technical	unnecessary changes	This section is on measuring methods - not data analysis. Leave original wording. If new procedures are recommended, they need to be applied in the appropriate section along with inclusion in the accountabilities section.	Accepted remove Section 5.7.3 on next ballot

451	Terry Blue	Negative	5.7.3	Entire Section	Technical	While the technical intent, preventing poor data from driving corrosion rates, is valid, adding this section to API 510 creates significant problems because it introduces guidance style narrative, subjective triggers, implied requirements, and data governance expectations into a prescriptive inspection code. It expands scope, reduces audit clarity, duplicates existing controls, and risks inconsistent enforcement without adding a clear, testable requirement. The content would be far more appropriate as informative guidance, a note, or placement in API 572 / RBI related documents, rather than as normative API 510 text.	Relocate this section to API 572 without making any requirements.	Noted remove section 5.7.3 on next ballot and scorecard to 572
452	Adam Keown	Negative	5.7.3	1 (Entire New Section)	Technical	This section is correctly a should, but needs some clarification on what it is looking for. A procedure does not make the process happen. Also, there is a lot of added editorial benefits and not defining what is required.	Proposed change, "Each owner-operator should have a thickness data accuracy review process. This process should be documented in a procedure which details how data errors and anomalies are identified and the process for validating the thickness readings. Some of the validation options are: a) through d). The thickness data accuracy review process should detail how inspection records are updated to document the validation process and how the thickness readings should be updated to accurately be used in future corrosion rate and thickness data analysis.	Noted remove section 5.7.3 on next ballot
442	Matt Caserta	Negative	5.7.3	1st paragraph	Editorial	In the second sentence of the first paragraph, "calculating short and LT corrosion rates." LT is not a common acronym for long-term and it doesn't help describe the short-term rate early in the sentence.	Change to "calculating short and long term corrosion rates"	Rejected see SK446 removing 5.7.3
445	David Wang	Negative	5.7.3	1st para, 2nd sentence	Editorial	Spell out LT.	... in the process of calculating short- and long-term corrosion rates, ...	Rejected see SK446 removing 5.7.3
448	Robert Sladek	NonVoter	5.7.3	P1, S2-S3	Technical	These 2 sentences belong in 5.7.2.4. Maybe as the last paragraph to feed into this section. Also, S3 can be improved.	Thickness data errors or anomalies being used in the process of calculating short and LT corrosion rates can affect the scheduled inspection interval and remaining life calculation. Examiners should have training and procedures that address UT measurement accuracy factors.	Rejected see SK446 removing 5.7.3
443	Matt Caserta	Negative	5.7.3	1st paragraph	Editorial	3rd sentence uses "taking". Correct grammar would be "taken"	Change to "taken"	Rejected see SK446 removing 5.7.3

449	Robert Sladek	NonVoter	5.7.3	P2	Technical	Remove unnecessary verbiage, clarify the subject and distinguish between verification and validation.	When thickness data measure errors/anomalies are suspected (e.g. thickness growths or losses of 10 % or more), the QUESTIONABLE MEASUREMENTS should be verified. The verification process SHOULD include validation of the questionable measurements using the following techniques:a) additional thickness measurements being repeated at the CML(s) in question;b) use of another trained NDE technician or inspector to take the validation readings;c) use of a different, calibrated thickness measuring device to take the validation readings;d) review and corrective action implemented for any other applicable factors (E.G., THOSE LISTED IN THIS SECTION) that may have been a factor in the questionable readings.	Rejected see SK446 removing 5.7.3
444	Matt Caserta	Negative	5.7.3	2nd paragraph	Editorial	First sentence has "thickness data measure errors/anomalies." measure is incorrect grammar.	"measure" should be changed to "measurement"	Accepted ME: Removed 5.7.3 SK 466
450	Edward Sanchez	Negative	5.7.3	P2, (d)	Technical	The factors in Section 5.7.1 have been removed.	Remove reference to 5.7.1 as the factors in that section were removed.	Rejected see SK446 removing 5.7.3
447	Robert Sladek	NonVoter	5.7.3	Title	Editorial	Remove "Accuracy" as it is unnecessary and add "Ultrasonic".	"Review and Verification of ULTRASONIC Thickness Data"	ME: Removed 5.7.3 SK 466
453	Adam Keown	Negative	5.8.2.1	1	Technical	The "pressure test" done on heat exchangers and air cooler assemblies are not the "pressure tests" defined in API 510. A pressure test per API 510 is a test after alteration and repair. The new text should be removed	Revert to the previous text and remove the heat exchanger section added.	Accepted revert to original
454	Jared Williamson	Negative	5.8.2.1	1st paragraph	General	The addition of the phrase "except for heat exchangers and air cooler assemblies, which are pressure tested after assembly" has no real benefit and does not fit the intent of the paragraph.	Remove this phrase.	Accepted revert to original
455	Jared Williamson	Negative	5.8.3.1	2nd paragraph	General	2nd reason for negative voteDo we want to include the formula for pneumatic tests here? What is a "code required pneumatic test"? We already have section 5.8.6 and it references back to PCC-2, where the details and precautions of pneumatic pressure tests are located.	Remove the entire addition regarding pneumatic pressure test.	Accepted revert to original
456	Jared Williamson	Negative	5.8.4.3	1st paragraph	General	Seems like this belongs in manufacturer guidance and owner user procedures, not necessarily the code.	Recommend removing the new addition	Not Accepted

457	Adam Keown	Negative	5.8.4.3 (New)	1	Technical	This doesn't need to have a "shall" in it. Owners can decide what they will do with spring cans, bellows and expansion joints. They just need the warning	Change to a "should" from a "shall"	Accepted
458	Ibrahim Kodssi	NonVoter	5.8.5.1	5.8.5.1	Editorial	Move the following to 5.8.4 : "All instruments and other components that might experience the full hydrostatic test pressure should be checked to determine they are designed for the specified pressure test; otherwise, they shall be blinded off from the test."	Move the following to 5.8.4 : "All instruments and other components that might experience the full hydrostatic test pressure should be checked to determine they are designed for the specified pressure test; otherwise, they shall be blinded off from the test."	ME: Not Accepted. 5.8.4 is pneumatic tests, this is written for hydrostatic tests.
459	Abhishek Gupta	NonVoter	5.8.7	5.8.7.1 b)	Editorial	ERROR	Remove 'RP' from API RP 571.	Accepted
468	Michael Schmidt	NonVoter	6.1.2	2nd sentence	General	Consider removing "internal" when referring to inspection. The risks associated with operational SU/SD should be evaluated for any planned inspections, not just internal visual inspections.	Consider revising the sentence as follows: "The risks associated with operational shutdown and start-up and the possibility of increased corrosion due to exposure of vessel surfaces to air and moisture should be evaluated when an internal inspection is being planned."	not accepted will draw a negative
460	Terry Blue	Negative	6.10.	Entire Section	Technical	While the intent of Section 6.10 is reasonable, it is largely redundant with existing API 510 provisions. Conditions such as below minimum thickness are already addressed through inspection results, remaining life calculations, and fitness for service evaluations in Sections 6, 7, and 8. Requirements for documentation of findings and evaluations are covered in Sections 7.8 and 7.9, while expectations for repair, temporary repair, continued operation with technical justification, or removal from service are addressed throughout Sections 6.7, 6.8, and 8. Introducing a separate "Equipment Deficiencies" section restates these concepts without adding new technical requirements, expands API 510 into internal management system practices such as risk ranking, work orders, and MOC, and increases the risk of internal inconsistency and audit ambiguity over time.	Delete this section or consider replacing with: "When inspections or examinations identify pressure vessel conditions that do not meet the acceptance criteria of this code (e.g., thickness below minimum required, unacceptable damage, or other integrity limiting conditions), the condition shall be evaluated to determine appropriate disposition. Disposition of such conditions shall be determined in accordance with this code and may include removal from service, repair, temporary repair, or continued operation with documented engineering justification, such as a fitness for service assessment performed in accordance with API 579 1/ASME FFS 1. Inspection findings, evaluations, and disposition decisions shall be documented in the inspection records in accordance with Section 7.8."	Accepted, section 6.10 removed
464	Brian Boss	Negative	6.10.	all	Technical	unnecessary changes	leave as original wording - not in correct section relating to inspection intervals and scope.	See SK 460, Section 6.10 removed

465	Darryl Godfrey	Negative	6.10.	Entire Section	Technical	Not clear what this section adds. Deficiency is not adequately defined (see previous comments on 3.1.19) .	Delete entire section or update 'deficiency' definition and clarify the requirements.	See SK 460, Section 6.10 removed
473	Rick Nichols	AffirmativeWithComment	6.10.	1st & 2nd para	Editorial	No hyphen	Add hyphen to "owner-operator"	See SK 460, Section 6.10 removed
477	Adam Keown	Negative	6.10 (New)	Entire Section	Technical	Defining "Equipment Deficiencies" is an important addition to API 510, but this section needs updates to the verbiage to be clear in what the term means.	Propose change to the section, "A pressure vessel can be identified as deficient (e.g. below tmin) through inspections or NDE. Once a deficiency is identified it should be treated as a hazard and communicated per owner-user's internal program. A deficiency may be corrected via removal from service, temporary repair or continued operation with technical justification (FFS).The deficiency and engineering evaluations should be documented in inspection reports. Deficiencies that require repair should have an inspection repair recommendation with a defined due date documented."	See SK 460, Section 6.10 removed
461	Christopher Archie	Negative	6.10.	6.1	Editorial	Change tmin in first sentence to "the required thickness".		See SK 460, Section 6.10 removed
462	Christopher Archie	Negative	6.10.	6.1	Editorial	Change tmin in first sentence to "the required thickness".		Noted. Duplicate comment.
463	Abhishek Gupta	NonVoter	6.10.	Para 1, line 2	Technical	ERROR	Suggest to replace 'a hazard' to 'unsafe to continue operate'.	See SK 460, Section 6.10 removed
466	Leslie Ward	Negative	6.10.	1st	Editorial	Consider changing the first sentence in this new section to two sentences. Make owner operator's hyphenated. "A pressure vessel can be identified as deficient through inspections or NDE (e.g. below tmin) once identified it should be treated as a hazard and communicated per owner operator's internal program."	Change the first sentence to two: A pressure vessel can be identified as deficient through inspections or NDE (e.g. below tmin). Once identified it should be treated as a hazard and communicated per owner-operator's internal program.	See SK 460, Section 6.10 removed

469	Christopher Archie	Negative	6.10.	6.10.	Editorial	It appears two sentences have been combined. The first sentence should end after "(e.g. below tmin)" and a new sentence start with "Once identified . . .".	A pressure vessel can be identified as deficient through inspections or NDE (e.g. below tmin). Once identified it should be treated as a hazard and communicated per owner operator's internal program.	See SK 460, Section 6.10 removed
470	Michael Schmidt	NonVoter	6.10.	1st paragraph 1st sentence	Editorial	Sentence needs a period after NDE and new sentence at the work Once.		See SK 460, Section 6.10 removed
474	Christopher Archie	Negative	6.10.	6.10.	Editorial	It appears two sentences have been combined. The first sentence should end after "(e.g. below tmin)" and a new sentence start with "Once identified . . .".	A pressure vessel can be identified as deficient through inspections or NDE (e.g. below tmin). Once identified it should be treated as a hazard and communicated per owner operator's internal program.	See SK 460, Section 6.10 removed
475	Edward Sanchez	Negative	6.10.	P1, S1	Editorial	Run-on sentence.	Put a period between "(e.g. below t-min)" and "once."	See SK 460, Section 6.10 removed
467	Leslie Ward	Negative	6.10.	2nd	Editorial	Consider changing owner operator to owner-operator's. "The deficiency should be documented through inspection reports, engineering evaluations, risk ranking per owner operator internal practice."	Change the sentence to state: "The deficiency should be documented through inspection reports, engineering evaluations, risk ranking per owner-operator's internal practice."	See SK 460, Section 6.10 removed
471	Michael Schmidt	NonVoter	6.10.	2nd paragraph	Editorial	Add the word "and" before "risk ranking"		See SK 460, Section 6.10 removed
478	Robert Sladek	NonVoter	6.10.	P2, S2	Technical	Since this is an inclusive list of deficiency mitigations, add "rerating the vessel and adjusting operations"	A deficiency may be corrected via removal from service, temporary repair, RERATING THE VESSEL AND ADJUSTING OPERATIONS or continued operation with technical justification (FFS).	See SK 460, Section 6.10 removed
472	Michael Schmidt	NonVoter	6.10.	3rd paragraph	Editorial	Add the word "or" before "other site"		See SK 460, Section 6.10 removed
476	Edward Sanchez	Negative	6.10.	P3	Editorial	An "or" needs to be inserted before the last phrase and "system" needs to be changed to "systems."	Change "other site tracking system" to "or other site tracking systems."	See SK 460, Section 6.10 removed
479	Robert Sladek	NonVoter	6.10.	P3, S1	Technical	Change "should" to "shall"	"The deficiency SHALL be documented through..."	See SK 460, Section 6.10 removed
481	Brian Boss	Negative	6.2.1.1	1	Technical	unnecessary changes	leave as original wording	noted see SK 482 keep the shall
480	Michael Schmidt	NonVoter	6.2.1.1	1st sentence of 1st paragraph	General	Not certain of the justification to soften the requirement for inspections at the time of installation from a shall to a should. If this comment is rejected, the shall in the last sentence of the paragraph should also be revised.		noted see SK 482 keep the shall

482	Leslie Ward	Negative	6.2.1.1	1st	Technical	BASIS FOR NEGATIVE.Keep shall in the first sentence.	Keep the sentence to state: "Pressure vessels shall be inspected by an inspector at the time of installation."	Accepted
484	Phillip Loya	AffirmativeWithComment	6.2.1.1	Paragraph 1	Technical	Disagree with this Shall -> Should Change. This statement provides justification for pushing for installation/baseline inspections when dealing with the Projects team. Changing to a should will allow for pushback if schedule or inconvenience is felt by the project team.	Recommend keeping as a Shall	noted see SK 482 keep the shall
485	William Martin	Negative	6.2.1.1	1	Technical	"Pressure vessels shall be inspected by an inspector at the time of installation." Does changing this to a "should" statement create a potential regulatory trap for users? What other methods are being used to satisfy OSHA 1910.119(j)(6)(iii)?	Leave as is.	noted see SK 482 keep the shall
483	Ibrahim Kodssi	NonVoter	6.2.1.1	6.2.1.1	Technical	Add "the vessel or" before "PRD"	Add "the vessel or" before "PRD"	not accepted, due to other edits
486	Darryl Godfrey	Negative	6.2.1.1	Bullet c	Technical	This is too specific as other design codes may apply.	c) PRDs satisfy design and installation requirements per the requirements of the applicable design codes.	Accepted
487	Denizhan GUL	NonVoter	6.2.2.1	first paragraph	General	inspection plan could be more suitable term than intervals	the inspection plan shall be established for the new service conditions	Accepted. Potential revise wording: the inspection plan and intervals shall be established . . .
494	Michael Schmidt	NonVoter	6.3.1	1st & 2nd sentence of 1st paragraph and 2nd paragraph	General	Consider revising the first sentence to internal visual and external visual inspection for consistency. Also revision of the 2nd sentence to remove the paragraph reference of "6.4 and 6.5" in favor of "this section" seems to result in circular reference. Consider removing this reference.		Noted ME to determine appropriate action. ME: Modified external visual but not for internal.Not going back to section references.
496	Darryl Godfrey	Negative	6.3.1	P1	Technical	BASIS for NEGATIVE. RBI assessments need to comply with API 580 and PRD's should be able to use RBI principles.	Modify as follows6.3.1 An RBI assessment, in compliance with API RP 580, may be used to establish the appropriate inspection intervals for internal, on-stream, and external, including CUI/CUF/ECSCC inspections and thickness examinations, as well as inspection and testing intervals for PRDs. The RBI assessment may allow previously established inspection intervals to be exceeded from limits specified in this section, including the 10 year inspection and one-half remaining life limits for internal and on-stream inspections and the 5-year inspection limit for the external inspections.	Accepted in principle

490	Adam Keown	Negative	6.3.1	1 (1st Sentence)	Editorial	Put "including CUI/CUF/ECSCC" into parentheses to be clearer	Change to "...intervals for internal, on-stream, external (including CUI/CUF/ExtCISCC), and thickness examination inspections."	ME: Accepted in Principle. Since this is a listing of inspection types, they should all be listed independently.
492	Denizhan GUL	NonVoter	6.3.1	first paragraph	General	It is important to reference API 580 to prevent the use of unsound methodologies and to highlight the full scope and essential elements of the API 580 RBI program.	RBI programme in compliance with API 580...	Not accepted, need to follow api rules
493	Mark Geisenhof	Negative	6.3.1	1st paragraph	Technical	"As well as inspection and testing intervals for PRD's" was deleted in the redline. This should not be deleted.	Add "As well as inspection and testing intervals for PRD's" back to the section.	noted
495	Robert Sladek	NonVoter	6.3.1	P1, S1	Editorial	If we approve the use of the term thickness "survey" over "examination", this should read "thickness surveys".	"... including CUI/CUF/ECSCC inspections and thickness surveys."	ME: Accepted in Principle. Since this is a listing of inspection types, they should all be listed independently.
491	Adam Keown	Negative	6.3.1	1 (2nd Sentence)	Technical	The previous reference to "exceeded from limits specified in 6.4 and 6.5" is correct. The RBI assessment may allow exceeding the External, Internal, On-Stream, and Thickness Measurement Inspection frequencies in 6.4 and 6.5 to the limits in 6.3.	Revert to previous, "6.4 and 6.5" and reject updating to "this section"	noted ME: Not Accepted
497	Darryl Godfrey	Negative	6.3.2	P1	Technical	Remove 'since the last update' as it is unnecessary and unclear. Last update to inspection interval or RBI assessment	Remove 'since the last update'	ME: Accepted in Principle, clarified this is as RBI time-based update to align with API 580 verbiage.
498	Robert Sladek	NonVoter	6.3.2	P1, S1	Technical	Basis for NEGATIVE (if I could vote). The engineer and inspector should be reviewing and approving all RBI updates which change the intervals/due dates - especially the ones that have intervals shorter than 10 years.	Replace this sub-section with "The engineer and inspector shall review and approve all risk assessments and updates which result in changes to the any inspection interval or due date."	Not Accepted
499	Michael Schmidt	NonVoter	6.3.2	1st paragraph	General	This shall statement requirement should be focusing on medium to high RBI risk vessels. Low risk vessels should not drive a shall statement for reassessment every 10 years. Consider revising to "internal visual" for consistency.	Consider revising to: "When an RBI interval for internal visual or on-stream inspection exceeds the 10-year limit for medium to high RBI risk inspection activities, the RBI assessment shall be reviewed and approved by the engineer and inspector at intervals not to exceed 10 years since the last update (or more often if warranted by process, equipment, or consequence changes)."	noted, unclear why would it only apply to med hi itemss
500	Adam Keown	Negative	6.3.2	1	Editorial	"Since the last update" doesn't appear to add anything and confuses as to what update it refers.	Reject additional text "since the last update"	ME: Accepted in Principle, clarified this is as RBI time-based update to align with API 580 verbiage.

505	Terry Blue	Negative	6.3.3	1st sentence	Technical	RBI assessments used to establish pressure vessel inspection intervals should not incorporate PRD plugging or reliability considerations. PRD performance does not directly influence pressure boundary degradation mechanisms, such as corrosion or cracking, that govern vessel likelihood of failure. Evaluation of PRD reliability, including susceptibility to plugging, is more appropriately addressed through relief system reliability and functional safety processes, where performance requirements are established to meet defined SIL or equivalent protection objectives, rather than through RBI interval determination for pressure vessels.	Delete "and potential fouling of the vessel's PRD(s).	Noted: no change Future discussion on PRD place in 510 needed
501	Christopher Archie	Negative	6.3.3	6.3.3	Technical	Remove the last sentence. This is scope for new vessels not in service vessels. A basis of NEGATIVE vote.		Accepted
502	William Martin	Negative	6.3.3	1	Technical	"A full internal inspection should be performed for identification of manufacturer or installation defects prior to moving to an RBI, nonintrusive inspection schedule." If this is intended to apply to both RBI and nonintrusive (on-stream?) separately, then the nonintrusive portion needs to be in a more applicable section. Perhaps 5.5.3.	Remove or write in a manner that clearly applies to non-RBI, also.	See sort key 435
503	Tony Poullassichidis	Negative	6.3.3	6.3.3	Technical	Last sentence in paragraph imposes mandatory internal inspection prior switching to RBI program. It is not a necessary requirement, owner-user should utilize his RBI program guidelines and able to decide best option for deploying RBI.	Remove last sentence.	See sort key 435
504	Christopher Archie	Negative	6.3.3	6.3.3	Technical	Remove the last sentence. This is scope for new vessels not in service vessels. A basis of NEGATIVE vote.		Noted. Duplicate comment.
506	Terry Blue	Negative	6.3.3	Last sentence	Technical	This sentence is problematic in API 510 because it imposes a universal internal inspection prerequisite that is not technically justified, conflicts with RBI principles, duplicates existing safeguards, and undermines risk based decision making. It treats manufacturing and installation defects as universally credible in all in service vessels, regardless of history, service, or inspection evidence. While internal inspections may be appropriate in many cases, mandating them as a condition for RBI adoption introduces unnecessary burden, limits valid non intrusive strategies, and exceeds the appropriate scope of a prescriptive in service inspection code.	Basis of Negative - Delete added sentence.	See sort key 435
507	Jared Williamson	Negative	6.3.3	Last sentence	General	Seems like this should be left to the owner to determine if this is necessary. This statement gets too close to telling sites exactly how to implement the intent of the code. Not saying it isn't good guidance, or a good practice, but there are a lot of good practices and guidance that we don't spell out in the code and it is a slippery slope.	Remove the last sentence.	See sort key 435

508	Michael Schmidt	NonVoter	6.3.3	1st and 2nd sentence	Technical	Consider revising to "internal visual" for consistency		See sort key 435
509	Robert Sladek	NonVoter	6.3.3	P1, S2	Technical	This should be more descriptive. The subject of this section appears to be PRDs. However, we use "full, internal inspection" to check manufacturer ID and installation". This doesn't make much sense to me as written. I also do not see the value in doing this action prior to RBI - sorry, but this confuses me.	"Inspection OF THE PRD should be performed for identification of manufacturer or installation defects prior to moving to an RBI, nonintrusive inspection schedule." ???	see SK507 Rejected
510	Mark Geisenhof	Negative	6.3.3	last sentence	Technical	Do not agree with adding stipulation to perform a full internal inspection prior to moving to an RBI, nonintrusive inspection schedule. Pressure vessels are inspected at time of fabrication for manufacturing and installation defects. This is unnecessary.	Basis of negative. Delete new sentence	See sort key 435
511	Leslie Ward	Negative	6.3.3	1st	Technical	What is a "full internal inspection?" Is a full internal inspection an inspection that requires entering a vessel? If the primary part of the vessel is not accessible for an internal inspection performed by inspector entering the vessel, then does that mean you can't manage the vessel in an RBI program?	Need to clarify the intent of what a full internal inspection is intended to be here.	See sort key 435
512	Darryl Godfrey	Negative	6.3.3	P1S2	Technical	This treats manufacturing and installation defects as universally credible in all in service vessels, regardless of history, service, or inspection evidence. Modify to make internal inspection prior to moving to an RBI non-invasive inspection conditional depending on the risk of manufacturing or installation defects resulting in loss of containment based on available manufacturing, fabrication and commissioning inspection evidence. It may be appropriate for high consequence equipment that hasn't received adequate QA/QC during manufacturer or installation or has identified manufacturing or installation issues that are impossible to find with non-intrusive inspection but not all equipment.	Modify to the following A full internal inspection prior to moving to an RBI non-invasive inspection should be performed depending on the risk of manufacturing or installation defects resulting in loss of containment based on available manufacturing, fabrication and commissioning inspection evidence.	See sort key 435
488	Brian Boss	Negative	6.3	all	Technical	unnecessary changes	leave as original wording	Accepted in principle Remove the red When an RBI assessment is used to extend the internal or on-stream inspection interval, the assessment should include a review of the inspection history and potential fouling of the vessel's PRD(s). A full internal inspection should be performed for identification of manufacturer or installation defects prior to moving to an RBI, nonintrusive inspection schedule,
489	Ibrahim Kodssi	NonVoter	6.3	6.3	Technical	Add: 6.3.4 Even when Risk Based Inspection (RBI) methodologies are applied, inspection intervals shall not exceed the remaining life of the equipment.	Add: 6.3.4 Even when Risk Based Inspection (RBI) methodologies are applied, inspection intervals shall not exceed the remaining life of the equipment.	Not accepted, no change due to other edits

750	Mark Hume	Negative	6.4.1	1st Sentence	Technical	The first statement reads "Unless justified by an RBI assessment, each aboveground pressure vessel shall have a visual external inspection at an interval that does not exceed the lesser of five years or the required internal/on-stream inspection." The 2nd condition is essentially stating we will ALWAYS do an external inspection with the internal inspection.	Additional content should be added to section 5.5.4 to support the requirement of doing an external inspection with every internal inspection. Or consider removing the 2nd condition from the Shall statement.	not accepted. Small task group (Jharville, Sanchez,Wdow, Akeown) determined no change
515	Robert Sladek	NonVoter	6.4.2	P1, S1	Technical	The "reason" is erroneous and unnecessary. Just say what is required.	"External inspection intervals are calendar years for all vessels including those in intermittent service and shall not be credited with idle operations."	Accepted in principle: just remove because the external environment does not change during noncontinuous/Intermittent service
517	Michael Schmidt	NonVoter	6.4.2	1st sentence	Technical	Consider revising to "External visual" for consistency		Noted ME to determine appropriate action. ME: sentence removed with SK 515
518	Michael Schmidt	NonVoter	6.4.2	1st paragraph	General	Consider adding this requirement for vessels that are in an idled condition for the same reason as those in intermittent service.		noted see SK515 ME: sentence removed with SK 515
519	Ken Min	Negative	6.4.2	1st Para	Technical	This section seems to equate noncontinuous/intermittent service to continuous service stating the external environment does not change. Since metal temperature could be different for these scenarios, I would characterize this as an external environment change. This is supplemented by the addition of "Calculated estimates of external corrosion rates shall consider all operating scenarios including idled temperatures."I have no issue with the intervals not changing in non-RBI scenarios, but the justification for why they are not changing seems inaccurate.	Simplify section to "External inspection intervals for vessels in noncontinuous/intermittent service are the same as for vessels in continuous service. Calculated estimates of external corrosion rates shall consider all operating scenarios including idled temperatures."	Noted: See SK515 ME: sentence removed with SK 515
521	William Martin	Negative	6.4.2		2 Technical	"Calculated estimates of external corrosion rates shall consider all operating scenarios including idled temperatures." This is very difficult, time consuming, and often unnecessary for batch operations. Agree that it should be considered, but not a "shall." If it were easy to do, we would certainly be doing it already to extend our intervals.	Change from "shall" to "should."	Accepted in principle revert to original - Remove the new sentence
522	Ray Konet	Negative	6.4.2	2s	Technical	New sentence implies that we use estimates of external corrosion rates for intervals. Not sure where that it located in the code. Plus we don't use "should consider".	Suggest delete.	Accepted revert to original - Remove the new sentence
520	Scott Sinclair	Negative	6.4.2	last sentence	Editorial	Currently states "For equipment abandoned-in-place, the owner-operator may need to conduct appropriate external inspections to make sure deterioration of insulation, vessel supports, and other appurtenances do not deteriorate to the point where they become a hazard to personnel or to any nearby in-service equipment." Stating that deterioration does not deteriorate to the point of becoming a hazard is poor wording.	Change to "For equipment abandoned-in-place, the owner-operator may need to conduct appropriate external inspections to make sure insulation, vessel supports, and other appurtenances do not deteriorate to the point where they become a hazard to personnel or to any nearby in-service equipment."	ME: Accepted
516	Robert Sladek	NonVoter	6.4.2	P2, S1	Technical	change "may need to" to "should"	"For equipment abandoned-in-place, the owner-operator SHOULD conduct THE appropriate external inspections..."	Accepted editorial

514	Robert Sladek	NonVoter	6.4.	All	Technical	Do we want an inspection frequency for CUI/CUF? OR, do we think we already have one? We don't. If the External inspection is inclusive of CUI/CUF inspections, I believe some reorganization is required. If external and CUI/CUF are exclusive, we need a new section in Section 6 to define the frequency and extent? of CUI/CUF inspection.	If the former, Move Section 5.5.6(CUI/CUF) as a new subsection under 5.5.4 (External) and incorporate 5.5.1.e to bullet 5.5.1.c If the latter, Add a new section to Section 6 for CUI/CUF frequency and extent. I volunteer to help edit once the TG has determined the path forward.	Rejected will draw negative
513	Muhammad Ali	NonVoter		6.4 External Inspection	Technical	There are few services for which 5 years external inspection interval is not applicable e.g. NACE 0294 external inspection interval requirement as mentioned in 5.1.3.2. equipment handling sulfuric acid.	Add NACE 0294 external inspection interval requirement for sulfuric acid horizontal tanks fabricated as per ASME Sec VIII Div.1	Rejected this is covered without the nace reference.
523	Muhammad Ali	NonVoter		6.5 6.5.1.1 Inspection Interval	Technical	There are few services for which 0 years internal inspection interval is not applicable e.g. NACE 0294 internal inspection interval requirement as mentioned in 5.1.3.4. equipment handling sulfuric acid.	Add NACE 0294 internal inspection interval requirement for sulfuric acid horizontal tanks fabricated as per ASME Sec VIII Div.1	Noted future discussion needed - Nace 0294 does 5 year max for external and 10 year for internal.
524	Denizhan GUL	NonVoter	6.5.1.1	first paragraph	General	While deciding inspection interval credible damage mechanism and damage modes should be considered	Inspection intervals shall be established by the inspector or engineer in accordance with the owner-operator's QA system. All credible damage modes, not limited to thinning, shall also be taken into account.	Rejected this is covered with RBI assessment
525	Michael Schmidt	NonVoter	6.5.1.1	1st, 2nd, and last sentences	Technical	Consider revising to "internal visual" for consistency in the 1st, 2nd, and last sentence. Revise the 2nd sentence to provide clarity on managing internal damage mechanisms using non-intrusive inspection techniques.	Consider revising the 2nd sentence to: "When the extent of damage can be detected or effectively monitored using non-intrusive inspection techniques, an internal visual inspection is not required at one-half the remaining life.	noted future discussion needed - ME: do not accept "internal visual".
526	Robert Sladek	NonVoter	6.5.1.2	P1, S1	Technical	Use the term "thickness examination survey" here to distinguish between examination of all CMLs versus just a few.	"Unless justified by an RBI assessment, the period between thickness EXAMINATION SURVEYS shall not exceed..."	Accepted
527	Robert Sladek	NonVoter	6.5.1.3	All	Technical	This paragraph is guidance about investigating process changes and not a requirement about internal inspection intervals. I suggest this be moved to either API 572 or section 5.5.2.	Move this guidance to Section 5.5.2 or API 572	Rejected may draw negative

528	Michael Schmidt	NonVoter	6.5.1.3	1st paragraph	General	Consider tying IOW monitoring into the requirements for communication regarding operational changes that could affect integrity.	Consider adding the following sentence immediately following the 3rd sentence: "These alerts may be in the form of IOW exceedences."	Rejected this is covered by what is currently in the para
529	Robert Sladek	NonVoter	6.5.1.4	P1, S1	Technical	I believe the intent of this section was to provide an option to use actual service for intermittent versus calendar when computing the internal inspection interval. Change "is" to "may be".	"For pressure vessels in noncontinuous/intermittent service, the interval MAY BE based on..."	Accepted
530	Edward Sanchez	Negative	6.5.1.4	P1	Editorial	In the CUI/CUF sections, we use the term "intermittent/noncontinuous" where the latter term seems to be added. In this section, the term is "noncontinuous/intermittent" where again the latter term is the one that is added. We should standardize on the order of these words if we want to use this term.	Standardize the order of the words in the term "intermittent/noncontinuous."	Accepted in principle. See SK 384
531	Michael Schmidt	NonVoter	6.5.1.4b)	last sentence	General	Consider removing internal and on-stream intervals and revising to "inspection"	Consider revising sentence as follows: "The corrosion rates should be carefully reviewed before setting the inspection intervals."	accepted
532	Robert Sladek	NonVoter	6.5.1.5	P1, S4	Technical	change "is" to "shall not exceed".	"Unless an RBI assessment is performed, the maximum inspection interval using this method SHALL NOT EXCEED 10 years."	Rejected may draw negative
534	Jared Williamson	Negative	6.5.1.6	Whole paragraph	General	3rd reason for negative voteThe new addition completely changes the intent and interpretation of the original paragraph. The way it was originally written, it gave the owner the freedom to have a corrosion expert determine if a vessel was truly in a non-corrosive process. If so, they could waive the internal inspection. Changing this paragraph now, will greatly impact many sites and individuals. We need to remember this code is used not only for refineries, but also for specialty chemicals where completely non-corrosive processes do exist that may not require an internal inspection. Not only this but the new paragraph contradicts itself by saying it cannot be inspected for credible degradation mechanisms, but the only way to claim this exemption is to prove that none exist.	Leave the original paragraph in place, or at most a slight reword if some determine the intent is not clear. Since the scenario with aluminum core exchangers not being able to be satisfactorily inspected actually falls within section 6.5.2.1 a) the paragraph could be rewritten as " Vessels may be exempt from the internal inspection and corrosion monitoring designated in this section provided a qualified corrosion subject matter expert (SME) documents that there are no credible internal degradation mechanisms. External inspections are still required."	Accepted revert to original
535	William Martin	Negative	6.5.1.6	1	Technical	The text as rewritten eliminates the intended flexibility of the first sentence.	Reason for negative vote. Leave as is or write more clearly so that inspections are not required for damage mechanisms that are not credible. Text also seems out of place. It's currently in the inspection interval section and should be in the internal inspection section (5.5.2.1).	Accepted revert to original

536	Adam Keown	Negative	6.5.1.6	1	Technical	This is a change from the intent of the previous paragraph and changes the allowed exemptions from certain inspections. This eliminates the ability of owners-users to determine what credible damage mechanisms are applicable and when they need to inspect regardless of if the vessel can be entered or not.	Basis for Negative - Change to, "6.5.1.6 Vessels may be exempted from the requirements of this section for the specific scenarios listed below. If these exemptions to internal, on-stream, and thickness inspections are applied, external inspections are still required. 6.5.1.6.1 Vessels that by their design cannot be satisfactorily inspected either internally or on-stream for credible degradation mechanisms (e.g., aluminum core exchanger) may be exempted from internal inspection and corrosion monitoring designated in this section When this exemption is applied, the equipment shall have appropriate analysis, monitoring, and maintenance strategies to manage the risk of failure. 6.5.1.6.2 Vessels that have been evaluated and documented by a qualified corrosion specialist as having no credible internal degradation mechanisms may be exempted from internal inspection and corrosion monitoring designated in this section. When this exemption is applied, the evaluation data and results shall be documented and approved."	Accepted revert to original
537	Ray Konet	Negative	6.5.1.6	1s	Technical	The proposed new words don't make sense. If a vessel cannot be satisfactorily inspected either internally or on-stream for credible degradation mechanisms, why do you require the corrosion specialist to say there are no credible mechanisms? I propose breaking up the two statements using the current verbiage as they were separate situations when originally drafted.	Propose: 6.5.1.6 Vessels may be exempt from the internal inspection and corrosion monitoring designated in this section provided a qualified corrosion subject matter expert (SME) documents that there are no credible internal degradation mechanisms. External inspections are still required for the equipment. 6.5.1.7 Vessels by their design that cannot be satisfactorily inspected either internally or onstream for credible degradation mechanisms (e.g., aluminum core exchanger) shall have appropriate analysis, monitoring, and maintenance strategies to manage the risk of failure. External inspections are still required for the equipment.	Accepted revert to original

533	Michael Schmidt	NonVoter	6.5.1.6	1st and last sentence	General	Consider revising on-stream and external inspections to non-intrusively and External visual inspections respectively. Revise degradation mechanisms to damage mechanisms for alignment with API 571 and with defined terms in this document.	Consider the following revisions: 1st sentence: "Vessels by their design that cannot be satisfactorily inspected either internally or non-intrusively for credible damage mechanisms ... may be exempted from internal visual inspection ... are no credible internal damage mechanisms." Last sentence: "External visual inspections are still required."	Noted Nonintrusive voting done in SLC ME: Reverted to original wording with SK 534
539	Michael Schmidt	NonVoter	6.5.2.1	1st sentence	Technical	Consider revising to "internal visual" for consistency		Noted ME to determine appropriate action ME: Not accepted, not adding "visual" to internal.
543	Michael Schmidt	NonVoter	6.5.2.1a)	1st sentence	Technical	Consider revising to "internal visual" for consistency		Noted ME to determine appropriate action ME: Not accepted, not adding "visual" to internal.
545	Michael Schmidt	NonVoter	6.5.2.1b)	1st sentence	Technical	Consider revising to "internal visual" for consistency		Noted ME to determine appropriate action ME: Not accepted, not adding "visual" to internal.
540	Mark Geisenhof	Negative	6.5.2.1	Item 5	Technical	The intent of this section was to ensure this clause was only applied to lower risk vessels. Item 5 was to exclude vessels operating in the creep range. Do not agree with adding new language for FFS assessment with 10 years remaining life. That would be a higher risk vessel and should be excluded from this option	Delete new sentence at the end of 5	Accepted
541	Mark Geisenhof	Negative	6.5.2.1	item 6	Technical	Do not agree with changing hydrogen damage to hydrogen cracking. Hydrogen damage is a broader term and is better descriptor to define a low risk vessel	change back to hydrogen damage	Accepted
542	Jared Williamson	Negative	6.5.2.1	Bullet 6	General	Why change from hydrogen damage to hydrogen cracking? Are we not concerned with DMs like high temp H2 corrosion?	change back to "damage"	Accepted
544	Michael Schmidt	NonVoter	6.5.2.1a) (new)	Insert a new paragraph a) and revise a) to b), etc.	Technical	Consider adding an additional condition allowing for the use of non-intrusive inspection techniques during on-stream inspections in lieu of internal visual inspections.	"Consider adding a new condition paragraph:"a) When all known internal damage mechanisms to the pressure boundary as documented in the inspection plan can be effectively monitored using on-stream non-intrusive inspection techniques under the following conditions:1) Appropriate NDE techniques can be selected and applied to the extent necessary to provide the appropriate level of inspection effectiveness.2) Inherent limitations for applying the appropriate on-stream inspections do not impede the ability to obtain the appropriate level	Noted further discussion needed

546	Michael Schmidt	NonVoter	6.5.2.1c) (new)	new paragraph after existing a) paragraph	Technical	Consider adding an additional condition after existing item a) (which would be b) if condition above is added).	Consider adding a new condition paragraph:"c) When the risks associated with operational shutdown and start-up or the possibility of increased corrosion due to exposure of vessel surfaces to air and moisture is greater than the risk reduction an internal visual inspection could achieve over that of on-stream non-intrusive inspection techniques."	Rejected will draw negative
547	Michael Schmidt	NonVoter	6.5.2.2	1st paragraph	General	change the paragraph reference if comments above are approved. Also, this paragraph may become obsolete if comments above are considered acceptable as on-stream non-intrusive techniques could be employed if specified in the inspection plan with or without an RBI assessment.	Consider re-writing or eliminating given comments regarding paragraph 6.5.2.1 above	Rejected will draw negative
548	Ibrahim Kodssi	NonVoter	6.5.2.2	6.5.2.2	Technical	Add the following to the end of the paragraph: "When creep is assigned as a credible damage mechanism in the CCDs or in consultation with a corrosion specialist/engineer, the RBI assessment shall require an FFS assessment by an engineer that shows the remaining life for creep damage is more than 10 years."	Add the following to the end of the paragraph: "When creep is assigned as a credible damage mechanism in the CCDs or in consultation with a corrosion specialist/engineer, the RBI assessment shall require an FFS assessment by an engineer that shows the remaining life for creep damage is more than 10 years."	Discussion
538	Michael Schmidt	NonVoter	6.5.2	Title	Technical	Consider revising to "internal visual" for consistency	Consider revising to: "On-Stream Inspection in lieu of Internal Visual Inspections"	Noted ME to determine appropriate action ME: not changing to "internal visual"
550	Michael Schmidt	NonVoter	6.5.3	Entire section	General	Consider re-writing or eliminating this section if all known and applicable damage mechanisms can be managed using non-intrusive techniques during onstream inspections.	Same or similar service considerations should only be applicable if a vessel cannot effectively be managed using non-intrusive inspection techniques while on-stream. Environmental cracking or hydrogen damage assessment is usually managed using NDE techniques applied from the exterior of the vessel and may be applied whether the vessel is on-stream or out of service.	not accepted will draw a negative
551	Robert Sladek	NonVoter	6.5.3	P1, S1	Technical	We do not mention similar "design" or "material" in this section. Is this intentional?	"When a vessel has been internally inspected, the results of that inspection can be used to determine whether an on-stream inspection can be substituted for an internal inspection on a pressure vessel OF SIMILAR DESIGN AND MATERIAL operating within the same or similar service and conditions."	accepted
552	Robert Sladek	NonVoter	6.5.3	P2, S1.c	Technical	This paragraph is vague and could be interpreted to apply only to the donor vessel.	"sufficient corrosion history has been accumulated FOR THE ENTIRE TRAIN."	Accepted

553	Robert Sladek	NonVoter	6.5.3	P3, S1	Technical	Are we giving permission to use risk/RBI here?	If yes, "Risk assessment or RBI analysis may be USED..."If no, "Risk assessment or RBI analysis CAN be USED..."	Noted May is appropriate
554	Robert Sladek	NonVoter	6.5.3	P4, S1	Technical	Hydrogen Cracking is environmental cracking. No need to call it out. Hydrogen Damage is inclusive of blistering which is not a form of cracking.	Remove "However," and leave the rest of the sentence as original.	Accepted in principle: remove however change hydrogen cracking to hydrogen damager
555	Mark Geisenhof	Negative	6.5.3	4th paragraph	Technical	Do not agree with changing hydrogen damage to hydrogen cracking. Hydrogen damage is a broader term and is better descriptor to define a low risk vessel	change back to hydrogen damage	accepted
549	Jared Williamson	Negative	6.5.3	Paragraph 5	General	Why change from hydrogen damage to hydrogen cracking? Are we not concerned with DMs like high temp H2 corrosion?	change back to "damage"	accepted
559	Leslie Ward	Negative	6.6.1	1st	Editorial	Change the reference for the definition of repair organization to 3.1.75.	Change the first sentence to state: "PRDs shall be tested and repaired by a repair organization qualified and experienced in relief valve maintenance per definitions in 3.1.75."	not accepted
560	Ken Min	Negative	6.6.1	1st Para	Editorial	PRD was corrected to PRD instead of PRV. There are significant instances of PRD in 6.6 where PRD could be replaced with PRV making the usage inconsistent.	Review whether the intent was to correct to PRV or leave as PRD. Given section 6.6 is called Pressure relieving and Safety Relief Devices, it could go either way as both PRD and PRV can fit in this section. Review other instances of PRD usage in section 6.6	Accepted Disposition
562	Abhishek Gupta	NonVoter	6.6.3	6.6.3.1	Editorial	should remain consistent to use PRD	replace 'PRVs' to 'PRDs'	Accepted
566	Darryl Godfrey	Negative	6.6.3	P1	Technical	PRDs not PRVsNot clear why the text is removed. It provides useful information and key concepts in setting PRD inspection intervals. It should be retained unless the reason for deletion can be justified.	Retain original text and/or provide justification for the text removal.	Accepted
567	Jared Williamson	Negative	6.6.3.1	First word	General	Inconsistent nomenclature. Everywhere else we are saying PRD.	Change back to PRD.	Accepted in principle revert to original
568	Ken Min	Negative	6.6.3.1	1st Para	Editorial	Suggestion on rewording.	Revise 'as per' to 'in accordance with'.	Not Accepted
569	Mark Geisenhof	Negative	6.6.3.1	1st sentence	Technical	Do not agree with adding shall be inspected and tested as per API 576. API 510 sets inspection intervals for PRD's.	Remove as per API 576 and add back deleted text from remainder of paragraph	Accepted in principle revert to original
570	Leslie Ward	Negative	6.6.3.1	1st	Technical	What is the reason for changing PRDs to PRVs in the first sentence? Do not make the change. BASIS FOR NEGATIVE.	Keep PRDs at the beginning of the first sentence: "PRDs shall be tested and inspected as per API 576."	Accepted in principle revert to original

571	Robert Sladek	NonVoter	6.6.3.1	P1, S1	Technical	This statement is redundant to the one in 6.6.1, P1, S2 and does not belong in the intervals section	Remove this sentence.	Revert to original see SK 570
587	Christopher Archie	Negative	6.6.3.4	6.3.3.1	Technical	Keep PRDs rather than change to PRVs. API 576 covers more than just PRVs.		Accepted in principle revert to original
588	Christopher Archie	Negative	6.6.3.4	6.3.3.1	Technical	Keep PRDs rather than change to PRVs. API 576 covers more than just PRVs.		Noted. Duplicate comment.
572	Matthew Cassidy	AffirmativeWithComment	6.6.3.2	Sentence 2	Editorial	sentence is incomplete after the redline.	currently "... may have prevented the valve from operating at set pressure and give a false."proposed "...may have prevented the valve from operating at set pressure"	Accepted
573	Jared Williamson	Negative	6.6.3.2	1st paragraph and a)	General	If we change the wording here and remove "typical process" and add "fouling or corrosive" we will need to update API 576 6.9.1 and API 570 6.7.3.2	Leave the original wording as "typical process"	Accepted
577	Leslie Ward	Negative	6.6.3.3	1st	Technical	We need to consistently use "'as-received' set pressure (pop) test/testing." If possible, "as-received" pop testing should be conducted prior to cleaning in order to yield accurate "as-received" pop testing results that will help establish the appropriate inspection and servicing interval.	Change the first sentence to state: "If possible, "as-received" set pressure (pop) testing should be conducted prior to cleaning in order to yield accurate "as-received" set pressure (pop) testing results that will help establish the appropriate inspection and servicing interval.	ME: Accepted in principle.If we add parentheses to the first instand of "pop" then we can use it later without that the preceeding "set pressure".
564	Christopher Archie	Negative	6.6.3	6.6.3.3	Technical	There are some words missing at the end of the second sentence. What was intended to go after "and give a false"?		noted revision is 6.6.3.3 If possible, "as-received set pressure (pop) testing should be conducted prior to cleaning in order to yield accurate "as-received" pop testing results that will help establish the appropriate inspection and servicing interval. Cleaning of deposits prior to as-received set pressure (pop) testing can remove deposits that may have prevented the valve from opening at set pressure and give an inaccurate test result. and give a false. Refer to API 576 for more information on "as-received" (pop)testing. related to SK576 and 580
565	Christopher Archie	Negative	6.6.3	6.6.3.3	Technical	There are some words missing at the end of the second sentence. What was intended to go after "and give a false"?		Noted. Duplicate comment.
574	Jared Williamson	Negative	6.6.3.3	Middle of paragraph	General	"Pop" testing was changed to "set pressure" testing. Everywhere else we use the word "pop".	Leave original wording as "pop testing"	Not Accepted - See SK 578

575	Jared Williamson	Negative	6.6.3.3	End of paragraph	Editorial	Sentence ends open ended with "and give a false."	Complete the sentence. Suggest "and give a false positive test."	Accepted in Principle
576	Edward Sanchez	Negative	6.6.3.3	S2	Technical	The second sentence ends with "...give a false." Give a false what?	Finish the thought (give a false...) or remove the phrase.	Accepted
578	Leslie Ward	Negative	6.6.3.3	1st	Technical	We need to consistently use "'as-received' set pressure (pop) test/testing." "Cleaning of deposits prior to as-received pop set pressure testing can remove deposits that may have prevented the valve from opening at set pressure and give a false."This sentence is incomplete as revised. I have suggested a change to make it a complete sentence.	Change the second sentence to state: "Cleaning of deposits prior to "'as-received' set pressure (pop) testing can remove deposits that may have prevented the valve from opening at the correct set pressure."	Accepted
580	Mark Geisenhof	Negative	6.6.3.3	2nd sentence	Technical	leave "pop". Pop testing is used throughout paragraph and should not be changed here. The remainder of the redline in this sentence is not complete. Ends with and give a false.	change back to "pop" and delete "and give a false"	Accepted in Principle
581	David Wang	Negative	6.6.3.3	2nd to last sentence	Editorial	The sentence is missing a word at the end "give a false". Suggest adding result, i.e., give a false result from the pressure test.	give a false result.	Accepted in Principle
582	Robert Sladek	NonVoter	6.6.3.3	P1, S2	Editorial	Sentence is open-ended	end sentence at "...at set pressure." and remove "and give a false"	Accepted
583	Michael Schmidt	NonVoter	6.6.3.3	2nd sentence	Editorial	Incomplete sentence ending in "and give a false."	Consider changing to: "Cleaning of deposits prior to as-received pop set pressure testing can remove deposits that may have prevented the valve from opening at set pressure and thus provide inaccurate test results."	Accepted in Principle
584	Darryl Godfrey	Negative	6.6.3.3	P1S2	Technical	Sentence incomplete. No such thing as an 'as received' set pressure test. This is a pop test.Cleaning of deposits prior to as-received set pressure testing can remove deposits that may have prevented the valve from opening at set pressure and give a false ??? Refer to API RP 576 for more information on "as-received" (pop)-testing.	Reword as followsCleaning of deposits prior to as-received(pop) testing can remove deposits that may have prevented the valve from opening at set pressure and give an inaccurate test result. Refer to API RP 576 for more information on "as-received" (pop)-testing.	Accepted
563	Abhishek Gupta	NonVoter	6.6.3	6.6.3.3 line 5	Technical	ERROR	Add 'set pressure' after 'as-received'.	Accepted should be using the API 576 as received pop test, DJR 9/15/26 lets use the 576 language.
579	Leslie Ward	Negative	6.6.3.3	1st	Technical	We need to consistently use "'as-received' set pressure (pop) test/testing." "Refer to API RP 576 for more information on "as-received" (pop)-testing."	Change the last sentence to state: "Refer to API RP 576 for more information on "'as-received' set pressure (pop) testing."	Accepted

585	Leslie Ward	Negative	6.6.3.4	1st	Technical	The first sentence needs to change to use the phrase "'as-received' set pressure (pop) test" "When a PRD is found to be heavily fouled or stuck shut or when a PRD fails an "as received" pop test, the inspection and testing interval shall be reevaluated to determine if the interval should be shortened or other corrective action taken."	Change the first sentence to state: "When a PRD is found to be heavily fouled or stuck shut or when a PRD fails an "as-received" set pressure (pop) test, the inspection and testing interval shall be reevaluated to determine if the interval should be shortened or other corrective action taken."	Accepted
586	Leslie Ward	Negative	6.6.3.4	1st	Technical	The last sentence needs to change to use the phrase "'as-received' set pressure (pop) test," instead of "'As-received'" (Pop) Test Results," to be consistent with API RP 576."Refer to API 576 "'As-received'" (Pop) Test Results" for additional information on PRD pop test results and investigations." I don't think it needs to be capitilized.	Change the last sentence to state: "Refer to API 576 "'as-received' set pressure (pop) test" for additional information on PRD pop test results and investigations."	Accepted
589	Robert Sladek	NonVoter	6.6.3.5	P1, S2	Editorial	We need to standardize on grammar throughout. Are we going to use "is/are" after all instances of "(s)"?	If no, revert back to original. I think we should keep this whole section as singular and remove the "(s)" from the "valve(s)".	ME: Accepted - only instance of is/are following a "s" plural. Both are in this sentence.
561	Robert Sladek	NonVoter	6.6.3	All	Technical	Are these 2 different tests? If not, settle on terminology: "'as-received" pop testing" OR "as-received set pressure testing"	Pick one and use consistently	Accepted
556	Mark Geisenhof	Negative	6.6	titke	Editorial	keep title as pressure relieving devices. That is the title used in API 576	delete and Safety Relief	ME: Accepted
557	Leslie Ward	Negative	6.6	1st	Technical	The term Safety Relief Device or Devices is not used in API RP 576. The term Safety Relief Valve or Valves is described as "A safety relief valve is a PRV that may be used as either a safety or relief valve depending on the application. The trim of the safety relief valve will provide stable lifting characteristics on either compressible or incompressible media." I do not know if the term is used differently in the E&P world. The term is only used in Section 9 of API 510. Consider changing the phrase Safety Relief Device to Safety Relief Valve.	Change the title to section 6.6 to Pressure-relieving Devices and Safety Relief Valves" OR Change section 9.5 to use Pressure-relieving Device instead of safety relief device.	ME: Not Accepted - See SK 558
558	Jared Williamson	Negative	6.6	Title	General	A safety relief device IS a PRD. See API 576 4.1 and 4.2.1. No need to have both in the title	Remove "Safety Relief"	ME: Accepted
599	Darryl Godfrey	Negative	6.7.1	P1S2	Technical	Agree with update. Comment included as others have indicated they want this changed to a 'should'. It was previously a 'shall' and should remain a 'shall'. This needs to be a 'shall' statement and if updated to 'should' would go against the intent of the Code.	Agree with change.	Noted. Nothing to action.
590	Mark Geisenhof	Negative	6.7.1	2nd sentence	Technical	The added requirements for documenting deferrals is too prescriptive. Most simple deferrals would not need calculations to prove that the equipment is fit for service. The requirements for documentation is already covered in 6.7.2, 6.7.3 and 6.8	delete new text	Accepted Revert to original

591	Brian Boss	Negative	6.7.1	all	Technical	unnecessary changes	leave as original wording	Accepted Revert to original
592	Michael Schmidt	NonVoter	6.7.1	3rd sentence of the 1st paragraph	Technical	Not all deferrals are associated with thickness measurements and corrosion rates and do not lend themselves to calculations of remaining life. Examples would be inspections for CUI or cracking/hydrogen damage.	Consider revising to: "All deferrals shall be documented with the reason for the deferral, a risk review, and calculations as appropriate to prove that the equipment is currently fit for service through the next downtime, reviewed and signed by the appropriate level of site management."	not accepted see SK590 Revert to original
593	Grady Hatton	Negative	6.7.1	3rd sentence	Technical	Not all deferrals require calculations.	Basis of Negative - All deferrals shall be documented with the reason for the deferral and any data that will support that the equipment is currently fit for continued service.	not accepted see SK590 Revert to original
594	William Martin	Negative	6.7.1	1	Technical	Not all issues to be reviewed and assessed for a deferral involve calculations and the "appropriate level of site management" has not been defined.	Leave as is.	Accepted Revert to original
595	Edward Sanchez	Negative	6.7.1	P1, S3	Technical	I can understand calculations for corrosion rate or FFS analyses, but for PRDs, should calculations need to be documented? Requiring calculations for deferrals of PRDs would seem difficult if not impossible.	Remove the word "calculations" or revise sentence to not require calculations for deferrals of relief devices.	not accepted see SK590 Revert to original
596	Carlos Salazar	NonVoter	6.7.1	paragraph	Technical	Deferral approvals shall be aligned with another process like management of change and risk assessment	Consider to add a comment to explain that deferrals shall be in compliance of the MoC process and risk assessment	not accepted revert to original per other SK590
597	Terry Blue	Negative	6.7.1	2nd Sentence	Technical	"All deferrals shall be documented with the reason for the deferral, calculations to prove that the equipment is currently fit for service through the next downtime, reviewed and signed by the appropriate level of site management. All deferrals shall be documented." is worded too strongly.	Consider rewording the new sentence as: "Deferrals should be documented with the basis for the deferral and supporting information demonstrating that the equipment remains suitable for continued operation until the next planned opportunity."	noted Reverting to original language
598	Terry Blue	Negative	6.7.1	2nd Sentence	Technical	The opening sentence permits deferrals, while the following sentence implicitly characterizes them negatively. Because "frequent occurrence" is not defined and risk review is already an inherent part of the deferral process, this wording could create unnecessary compliance ambiguity.	Delete the second sentence ("Deferrals should be the occasional exception, not a frequent occurrence.").	noted Reverting to original language
600	Darryl Godfrey	Negative	6.7.2	P1 bullet b)	Technical	Very poorly written and mixes remaining life with t-min calculations. b) The proposed new due date would not increase the current inspection/servicing interval or due date by more than 10 % or six months, whichever is less, provided that the remaining life calculations do not exceed the T-min (or adjusted thickness from a FFS assessment).	Rewrite as follows b) The proposed new due date would not increase the current inspection/servicing interval or due date by more than 10 % or six months, whichever is less, and the predicted remaining thickness at the new due date is not less than T-min (or adjusted thickness from a FFS assessment).	Noted: revert to original

601	Ray Konet	Negative	6.7.2	b)	Technical	The added words need work if they are needed at all. Assume this means that the remaining life is greater than 6 months or the forecast remaining thickness at the end of 6 months is greater than tmin. Doesn't c) cover that. If not, doesn't 6.5.1 on inspection interval say the interval is up to the full remaining life when less than 2 years.	Restore original text.	Accepted Revert to original
602	Jared Williamson	Negative	6.7.2	Bullet (b)	General	The last part of the rewritten paragraph does not make sense : "provided that the remaining life calculations do not exceed the T-min (or adjusted thickness from a FFS assessment)" First, a remaining life cannot exceed a minimum thickness as the two are not equivalent. I believe I understand the intent of the added phrase, however, and it still doesn't seem to fit. The very definition / formula for remaining life calculation means it doesn't exceed the allowed limits of the T-required. See section 7.2.	Remove the last phrase of the paragraph: "provided that the remaining life calculations do not exceed the T-min (or adjusted thickness from a FFS assessment)"	noted Reverting to original language
603	Christopher Archie	Negative	6.7.2	b)	Technical	Replace "the remaining life calculations do not exceed the T-min (or adjusted thickness from a FFS assessment)" with "the remaining thickness is more than the required thickness at the proposed new due date."	The proposed new due date would not increase the current inspection/servicing interval or due date by more than 10 % or six months, whichever is less, provided that the remaining thickness is more than the required thickness at the proposed new due date.	noted Reverting to original language
604	Christopher Archie	Negative	6.7.2	b)	Technical	Replace "the remaining life calculations do not exceed the T-min (or adjusted thickness from a FFS assessment)" with "the remaining thickness is more than the required thickness at the proposed new due date."	The proposed new due date would not increase the current inspection/servicing interval or due date by more than 10 % or six months, whichever is less, provided that the remaining thickness is more than the required thickness at the proposed new due date.	Noted. Duplicate comment.
605	Adam Keown	Negative	6.7.2	b	Technical	It is understood what is meant, but the phrase, "provided that the remaining life calculations do not exceed the T-min (or adjusted thickness from a FFS assessment)" is confusing with the term "do not exceed"	Change from "do not exceed" to "do not fall below"	noted Reverting to original language
606	David Wang	Negative	6.7.2	Item b)	Technical	"remaining life calculations do not exceed T-min" is technically incorrect phrasing. You don't compare life to thickness. It mixes time limit (10% or 6 months) with a thickness criterion, and it is not clearly tied to the end of the extension.	The proposed new due date would not increase the current inspection/servicing interval or due date by more than 10% or six months, whichever is less, provided that the calculated remaining thickness at the end of the extension is not less than the minimum required thickness (Tmin) or the adjusted thickness from a fitness-for-service assessment.	noted Reverting to original language

607	David Wang	Negative	6.7.3	Item b)	Technical	The current wording limits mitigation considerations to IOWs and process control limits, which may not capture the full range of risk mitigation measures commonly applied in deferral situations (e.g., increased monitoring, temporary safeguards, administrative controls).	Determine if the deferral requires the implementation of, or modification to, existing integrity operating windows (IOWs) or operating process control limits, or other risk mitigation measures necessary to ensure that the risk remains acceptable.	Discussion
608	Denizhan GUL	NonVoter	6.8	the last sentence	General	Equipment shall be remained within the acceptable conditions.	Equipment shall remain within the acceptable limits for safe operation, as established by this code or by other engineering assessments during the period of deferral	Rejected no change, safe operation is subjective. Min thickness provides better guidance.
618	Jared Williamson	Negative	7.1.1.1	Middle of paragraph	General	We say "typically" in the paragraph regarding short term CR, but then say "shall" in the formula below with the qualifier that Tprevious is from the previous inspection.	Either strengthen the language of the paragraph or loosen the language of the definition in the formula.	Accepted
628	Brian Boss	Negative	7.1.1.1		1 Technical	unnecessary changes	leave as original wording	Accepted
609	Mark Geisenhof	Negative	7.1.1	1st sentence	Editorial	"and I applicable to uniform wall loss" does not make sense.	reword or delete	Noted see SK628
610	Phillip Loya	AffirmativeWithComment	7.1.1	Paragraph 1	Editorial	wording correction to redline inclusion Remove the "I" from redline. As written "and I applicable to uniform wall loss"	and applicable to uniform wall loss.	Noted see SK628
611	Abhishek Gupta	NonVoter	7.1.1	7.1.1.1 line 1 & 2	Technical	ERROR	Add 'Uniform or general' before 'corrosion rate' and suggest to remove 'and I applicable to uniform wall loss.'	noted covered under different SK.
612	Abhishek Gupta	NonVoter	7.1.1	7.1.1.1 line 1 & 2	Technical	ERROR	Suggest the below sentence to move after corrosion rate equations."Where corrosion is localized or of the pitting type in nature linear corrosionrate calculations may not be representative, and a more appropriate exponential or empirically derived model shallbe applied following consultation with a corrosion engineer."	noted covered under different SK.
613	Edward Sanchez	Negative	7.1.1	P1, S1	Editorial	Change "I" to "the" in the added portion.	Change "I" to "the" in the added portion.	Noted see SK628
616	Terry Blue	Negative	7.1.1.1	1st sentence	Technical	I can't undersand what was added or the value of it.	Delete added part of the end of the sentence.	Accepted
617	Keneth Marden	Negative	7.1.1.1	First sentence	General	Typo - "...readings and I applicable"	Correct the typo - maybe it is supposed to say "... readings and is applicable"?	Accepted in principle remove added words

621	Christopher Archie	Negative	7.1.1.1	7.1.1.1	Editorial	Remove "and I applicable to uniform wall loss." from the first sentence. This appears to be a typo.	Corrosion rate for thinning damage mechanisms is determined by the difference between two thickness readings divided by the time interval between the readings.	Noted see SK628
623	Christopher Archie	Negative	7.1.1.1	7.1.1.1	Editorial	Remove "and I applicable to uniform wall loss." from the first sentence. This appears to be a typo.	Corrosion rate for thinning damage mechanisms is determined by the difference between two thickness readings divided by the time interval between the readings.	Noted. Duplicate comment.
625	Matt Caserta	Negative	7.1.1.1	1st paragraph	Technical	BASIS FOR NEGATIVE - the addition of "and I applicable to uniform wall loss." If the intention of this sentence is to say that point to point corrosion rate is only applicable to uniform wall loss, that is a major departure from how all of industry determines corrosion rates for localized mechanisms.	Remove "and I applicable to uniform wall loss"	Accepted
626	David Wang	Negative	7.1.1.1	1st para, 1st sentence	Editorial	The "I applicable" should be "is applicable".	... is applicable to uniform wall loss.	Noted see SK628
627	Michael Schmidt	NonVoter	7.1.1.1	1st sentence 1st paragraph	Editorial	wording	Consider revising the word "I" to "is"	Noted see SK628
629	Robert Sladek	NonVoter	7.1.1.1	P1, S1	Technical	New text does not make sense. Is the intent to state that this method is only applicable to general thinning?	Revert to original text	Noted see SK628
631	Ray Konet	Negative	7.1.1.1	1p1s	Technical	Corrosion rates determined from thickness measurements are applicable to metal loss regardless of uniform or localized.	Negative: Delete new words.	Accepted
633	Leslie Ward	Negative	7.1.1.1	1st	Editorial	Consider changing "and I applicable" to "and applies." Change rate to rates. Corrosion rate for thinning damage mechanisms is determined by the difference between two thickness readings divided by the time interval between the readings and I applicable to uniform wall loss.	Change the first sentence to state: "Corrosion rates for thinning damage mechanisms are determined by the difference between two thickness readings divided by the time interval between the readings, and applies to uniform wall loss."	Noted see SK628
634	Zongqi Sun	AffirmativeWithComment	7.1.1.1	1st sentence	Editorial	"and I applicable to" what does it mean by I? Please Correct.		Noted see SK628
614	Edward Sanchez	Negative	7.1.1	Last sentence	Technical	Basis for negative. This is a strange place for a "shall" as it only applies to a potentially difficult to determine condition (general or localized corrosion or pitting). Even if it does apply to only localized corrosion or pitting, it seems to imply that we cannot use the equations below but "shall" use an "appropriate exponential or empirically derived model" after we consult with a corrosion engineer.	If we want to require the use of "appropriate exponential or empirically derived models" to determine corrosion rates for localized thinning and pitting, we're going to have to give examples of these models in the same manner calculations are provided for general thinning.	Noted see SK628

615	Ibrahim Kodssi	NonVoter	7.1.1.1	7.1.1.1	Technical	Replace "Shall" with "Should" in the statement "...empirically derived model shall.."	Replace "Shall" with "Should" in the statement "...empirically derived model shall.."	Noted see SK628
619	Jared Williamson	Negative	7.1.1.1	End of paragraph	General	"Where corrosion is localized or of the pitting type in nature linear corrosion rate calculations may not be representative, and a more appropriate exponential or empirically derived model shall be applied following consultation with a corrosion engineer." I disagree with the "shall" statement in this sentence.	Make this a "should" statement, e.g., "should be applied following consultation with a corrosion engineer"	Noted see SK628
620	William Martin	Negative	7.1.1.1		1 Technical	"Where corrosion is localized or of the pitting type in nature linear corrosion rate calculations may not be representative, and a more appropriate exponential or empirically derived model shall be applied following consultation with a corrosion engineer." The first may implies that the "shall" also needs to be "may;" otherwise, there is a requirement for something that may not be applicable.	Change "shall" to "may."	Revert 7.1.1 to original
622	Christopher Archie	Negative	7.1.1.1	7.1.1.1	Technical	Remove "shall be applied" and replace with "should be considered". The sentence also needs a comma after nature.	Where corrosion is localized or of the pitting type in nature, linear corrosion rate calculations may not be representative, and a more appropriate exponential or empirically derived model should be considered following consultation with a corrosion engineer.	Noted see SK628
624	Christopher Archie	Negative	7.1.1.1	7.1.1.1	Technical	Remove "shall be applied" and replace with "should be considered". The sentence also needs a comma after nature.	Where corrosion is localized or of the pitting type in nature, linear corrosion rate calculations may not be representative, and a more appropriate exponential or empirically derived model should be considered following consultation with a corrosion engineer.	Noted. Duplicate comment.
630	Robert Sladek	NonVoter	7.1.1.1	P1, S5	Technical	"should" not "shall" and "specialist" not "engineer". "more appropriate" could be subjective. Break into 2 sentences. Also, move this to a new paragraph after the formulas- currently misleading.	"WHEN corrosion is localized or of the pitting type, linear corrosion rate calculations may not REPRESENT THE ACTUAL DAMAGE PROGRESSION. IN THESE CASES, AN exponential or empirically derived model SHOULD be applied with REVIEW AND APPROVAL OF THE corrosion SPECIALIST."	Noted see SK628
632	Ray Konet	Negative	7.1.1.1	1p5s	Technical	This sentence has a "shall" statement for models. Is that really what we are asking for. This seems way out of scope and don't support it.	Negative: Delete new words.	Accepted Revert to original

635	Adam Keown	Negative	7.1.1.2	1	Technical	The corrosion rate used should be the most accurate reflection of the corrosion rate anticipated between the evaluation date and the next inspection date, not the "corrosion rate that best reflects the current conditions"	update to "7.1.1.2 When evaluating corrosion rates as part of the data assessment, the inspector, in consultation with a corrosion specialist, shall select the corrosion rate that best reflects the conditions that the pressure vessel will be subject to before the next inspection."	Accepted.
641	Abhishek Gupta	NonVoter	7.1.2	Para 2, Line 1	Editorial	ERROR	Replace 'a) through d)' with 'a) through e)'	Accepted.
636	Robert Sladek	NonVoter	7.1.2	P1, S2	Technical	Use "MAY" instead of "CAN" since P2, S1 is a SHALL and is the basis for the RL and inspection interval.	"The remaining life and inspection interval MAY be estimated from this rate."	Accepted
637	Robert Sladek	NonVoter	7.1.2	P1, S2.e	Technical	I recommend we use "10 years" here instead of the "design life" to yield to the conservative	"A corrosion rate calculated as provided corrosion allowance divided by 10-YEARS."	not accepted will draw a negative
639	Brian Boss	Negative	7.1.2	e	Technical	unnecessary changes, does not update following paragraph. Why would a-d not be enough?	leave as original wording	noted
640	Abhishek Gupta	NonVoter	7.1.2	e)	Technical	ERROR	Replace 'calculated as provided corrosion allowance divided by design life of pressure vessel' with "may be estimated using corrosion allowance and design life of the equipment."	not accepted will draw a negative
642	Edward Sanchez	Negative	7.1.2	Listing	Editorial	Sentence fragment in bullet (e) compared to the other bullets.	Change to "A corrosion rate may be calculated as provided corrosion allowance..."	Accepted
643	Leslie Ward	Negative	7.1.2	1st	Editorial	In the new item e) consider changing "provided" to "design." Additional word smith is also provided. e) A corrosion rate calculated as provided corrosion allowance divided by design life of pressurevessel.	Change item e) to state: "A corrosion rate may be calculated as the design corrosion allowance divided by the design life of pressurevessel."	Accepted
638	Robert Sladek	NonVoter	7.1.2	P2, S1	Editorial	If we add "e)" above, change "d)" to "e)"?	"In a case where items listed a) through e) cannot be applied..."	Accepted.
644	David Wang	Negative	7.2.2	1st para, 2nd sentence	Editorial	Add "whether" after "determine" in the sentence to improve readability.	Care should be taken to determine whether the statistical treatment ...	Not Accepted

645	David Wang	Negative	7.2.3	2nd sentence	Editorial	Change "the data that is" to "the data that are", i.e., use are instead of is, since data is the plural form of datum. Or better yet, just delete "that is".	... as they are the data to be used to determine next inspection dates.	Not Accepted
646	Leslie Ward	Negative	7.2.3	1st	Editorial	Consider changing the word "retirement" to "end of life," in the last sentence. Bad data can lead to increased likelihood of unanticipated equipment failure or premature retirement of vessels (see API RP 572).	Change the last sentence to state: Bad data can lead to increased likelihood of unanticipated equipment failure or premature end of life of vessels (see API 572)."	Not Accepted
647	Robert Sladek	NonVoter	7.4.2	P1, S1	Editorial	Combine Pitting and LCA together.	API 579-1/ ASME FFS-1 provides assessment methodologies FOR THE EVALUATION OF LOCALLY THINNED AREAS AND PITTING."	Accepted
648	Robert Sladek	NonVoter	7.4.3	All	Editorial	Remove if merging with 7.4.2	Remove if merging with 7.4.2	Accepted
649	Brian Boss	Negative	7.4.3	all	Technical	Why remove this?	leave as original wording	not accepted. API 579/ASME deterind the evaluation should be same as for other and get the eval in 579
650	Jared Williamson	Negative	7.4.3	2nd paragraph/list	General	The pitting evaluation list has been removed. Is this no longer valid? This is a big deletion.	I recommend reinstating the evaluation list.	not accepted. API 579/ASME deterind the evaluation should be same as for other and get the eval in 579
651	Denizhan GUL	NonVoter	7.4.4	first paragraph	General	Since we reference API 579 for clauses 7.4.2 and 7.4.3, clause 7.4.4 " local metal loss" part is no longer seems required		Accepted in Principle ME to update as appropriate
652	Robert Sladek	NonVoter	7.4.4	All	Technical	This is redundant and unnecessary	Remove 7.4.4	Accepted in Principle ME to update as appropriate
653	Edward Sanchez	Negative	7.5	Listing	Technical	We removed a bunch of language above pertaining to things that can be found in other documents (such as damage mechanisms in API 571) but we kept all of these references here? This should be removed for the same reason and a reference to the pertinent document should suffice.	Remove this listing and make a reference to API 579-1/ASME FFS-1.	Noted for ME
654	Leslie Ward	Negative	7.5	1st	General	Check the lettering for each item. It seems to have gotten messed up.	Fix the lettering for each item.	Noted. Lettering is correct in the clean version.
655	Robert Sladek	NonVoter	7.5.	All	Technical	I recommend the bulleted portion of this section be removed. IF we keep this API 579 directory, we should remove the earlier references to 579 in section 7.4. (i.e., 7.4.2, 7.4.3 and 7.4.4)	Remove P1, S3 including bullets. Move "shall" statement in bullet a) to new sentence in P1:"FFS assessments for metal loss evaluation shall be established based on Section 6 of this inspection code."	Accepted in Principle ME to update as appropriate
657	Brian Boss	Negative	7.6	all	Technical	unnecessary changes	leave as original wording	Accepted Revert to original

656	Michael Schmidt	NonVoter	7.6	2nd sentence	Editorial	clarify the wording	Consider revising to: "For pressure vessels designed in accordance with ASME BPVC..."	Noted: Reverted to original wording see SK657
659	Jared Williamson	Negative	7.7	1st sentence	General	The addition of "evaluation should be performed on" does not fit the intent of the opening paragraph. The evaluation of minimally documented vessels is covered in 7.7.c).1)	Reinstate the original wording	Not accepted Evaluations "should" was added and voted on by committee due to Yenkin majestic CSB rec
660	William Martin	Negative	7.7	1	Editorial	The proposed change to the beginning of the sentence does not fit the last part.	Leave as is.	ME: Editorial, separated sentence
658	Mark Geisenhof	Negative	7.7	c-1	Technical	suggest to leave SA 283 Grade C. This gives the user more guidance on appropriate steel to use as a comparison for minimum stress values	Delete "Minimum stress allowed per ASME VIII div 1 and ASME II" and add back SA 283 Grade C	Accepted Revert to original
661	Christopher Archie	Negative	7.7	c)1)	Technical	UG-10(c) is now UG-10.3. Also leave SA-283 Grade C.	Material—See ASME BPVC, Section VIII, Division 1, Paragraph UG-10.3 for guidance onevaluation of unidentified materials. If UG-10.3 is not followed, then for carbon steels, useallowable stresses Minimum stress allowed per ASME VIII div 1 and ASME II for SA-283Grade C and for alloy and nonferrous materials, use X-ray fluorescence analysis todetermine material type on which to base allowable stress values.	noted Reverting to original language
662	Christopher Archie	Negative	7.7	c)1)	Technical	UG-10(c) is now UG-10.3. Also leave SA-283 Grade C.	Material—See ASME BPVC, Section VIII, Division 1, Paragraph UG-10.3 for guidance onevaluation of unidentified materials. If UG-10.3 is not followed, then for carbon steels, useallowable stresses Minimum stress allowed per ASME VIII div 1 and ASME II for SA-283Grade C and for alloy and nonferrous materials, use X-ray fluorescence analysis todetermine material type on which to base allowable stress values.	Noted. Duplicate comment.
663	Ray Konet	Negative	7.7	c)1)	Technical	The red-line words are out of place as the original concept is changed. Not sure where this was going.	Restore original text to use SA283 or clarify what is the new requirement.	Accepted Revert to original
664	Leslie Ward	Negative	7.7 c) 1)	1st	Technical	The edits to the second sentence don't make sense. I don't know what it is intended to say. Material—See ASME BPVC, Section VIII, Division 1, Paragraph UG-10(c) for guidance onevaluation of unidentified materials. If UG-10(c) is not followed, then for carbon steels, useallowable stresses Minimum stress allowed per ASME VIII div 1 and ASME II and for alloy and nonferrous materials, use X-ray fluorescence analysis todetermine material type on which to base allowable stress values.	Rewrite it as it was intended to be edited.	noted Reverting to original language
665	Keneth Marden	Negative	7.7 c) 1)	Second sentence	General	This sentence reads awkwardly with the proposed changes.	Reword the sentence; not sure what it is intended to say so I do not have a suggested change.	noted Reverting to original language

666	Chris Posey	NonVoter	7.7.c	7.7.c	Technical	Changing this from SA-283-C to lowest allowable stress could cause vessels with unknown material to suddenly become unacceptable. This is also less clear than the current edition. Is there any data behind the need for this change? Are we having failures in vessels with unknown material because we assume SA-283-C?	1) Keep SA-283-C as the prescribed material for vessels with unknown material. 2) If we want to change from SA-283-C, prescribe a specific material. 3) if we do not wish to prescribe a material, add specific detail to guide the user in selecting material. For example, guide user to select material available at the year of construction, etc.	Noted reverting to original
667	Jared Williamson	Negative	7.7.c).1)	Last sentence	General	4th reason for negative voteThe entire premise of this section is we do not know what material to look up in ASME II. That is the whole purpose of defining a material to use if you do not have the information.	Delete the addition and return to original wording.	Accepted Revert to original
668	Edward Sanchez	Negative	7.7.c.1	Bullet c.1	Technical	The addition of "Minimum stress allowed per ASME VII div 1 and ASME II" makes this sentence a jumbled mess.	Clarify the intent of this addition/change.	Accepted Revert to original
669	Denizhan GUL	NonVoter	7.7.C.1	C) 1	Technical	Since it is possible to use a stress value lower than SA 283 Grade C, using the minimum allowable stress as per the applicable design code is safer		not accepted revert to original per Other SK
670	Michael Schmidt	NonVoter	7.7c)1)	2nd sentence	General	confusing language, consider revising	Consider revising to: "If UG-10(c) is not followed, then for carbon steels, use the minimum allowable stress allowed per ASME VIII div 1 and ASME II. For alloy and nonferrous materials, use X-ray fluorescence analysis to determine material type on which to base allowable stress values	not accepted revert to original per Other SK
672	Robert Sladek	NonVoter	7.8.1	P1, S2	Technical	"shall" not "will".	"Permanent records SHALL be maintained throughout the service life of each equipment item; progressive records SHALL be regularly updated..."	Noted no change for this ballot it will draw negatives
673	Robert Sladek	NonVoter	7.8.2	P1, S2, b), S2+	Technical	The requirements for inspection reports are nested in the "example" of inspection history. It appears these were extracted and compiled into 7.9.2 (where they belong). Also, remove the shall statement from this example. Also applies to 9.4.c	"b) Inspection History—For example, inspection reports and data for each type of inspection conducted (e.g. internal, external, thickness measurements) and inspection recommendations for repair."Everything else in this bullet belongs to Section 7.9.	not accepted other SK 678 removes section 7.9
675	Ray Konet	Negative	7.8.2	b)	Editorial	Fix the typo in: and inspection recommendations for repair inspection reports shall document the date of each inspection	Add punctuation to make two sentences. Typo..... and inspection recommendations for repair. Inspection reports shall document the date.....	Accepted.

676	Leslie Ward	Negative	7.8.2 b)	1st	Technical	For the new sentence that was added, change the "should" to "shall" and a procedure with equipment. Additional word smithing was included in the suggested change. When data is collected using equipment that requires calibration prior, during, or after use, calibration records should be provided with examination results.	Change the new sentence to state: "When data is collected using procedures and/or equipment that require calibration before, during, or after use, calibration records shall be provided with examination results".	Not accepted revert to original SK677
677	Brian Boss	Negative	7.8.2.b	all	Technical	unnecessary changes	leave as original wording	Accepted Revert to original
674	Robert Sladek	NonVoter	7.8.2	P1, S2, d)	Technical	Rename this bullet to "Equipment management documentation" include as examples: FFS, RBI Updates, Deferrals, Thickness Surveys, CR and RL Calcs, inspection continuous history report, Approved AI. Also applies to 9.4.d (new bullet)	Equipment management documentation - For example, inspection plan, completed deferral records, thickness surveys with related corrosion rate and remaining life analyses, inspection continuous history report, AI use approvals, RBI assessments (per API 580 requirements) and FFS assessments (per API 579-1/ASME FFS-1 requirements), repair and alteration authorizations.	Not accepted revert to original SK677
671	Abhishek Gupta	NonVoter	7.8	Title	Technical	Since there is a separate section for Reports, 7.9, added, shall we remove Reports from 7.8?	Suggest to keep section 7.8 as "Records" only.	Noted captured by other comments
682	Robert Sladek	NonVoter	7.9.1	P1, S1	Editorial	no need to call out specific sections.	For each external inspection performed and each internal inspection performed the authorized inspector shall...	Accepted
683	Robert Sladek	NonVoter	7.9.1	P1, S2	Editorial	Use owner-user instead of owner/operator	"...shall be maintained by the owner-user for the life of the vessel."	Accepted in Principle
684	Leslie Ward	Negative	7.9.1	1st	General	There are a variety of instances where "owner-operator" is not hyphenated. See the new second sentence in this new section.	Fix owner/operator to owner-operator.	Accepted.
686	Darryl Godfrey	Negative	7.9.1	P1	Technical	BASIS for NEGATIVE Language is not clear. What is 'documentation of disposition'? Documented history of each inspection recommendation detailing inspection request, reasons for request, whether it was completed as requested and if not why it was not implemented as requested. The records should also indicate the disposition of each inspection recommendation, including the reason why an inspection recommendation was not implemented.	Clarify language such as 'documentation of disposition'	Noted: section 7.9 removed SK 678

687	Darryl Godfrey	Negative	7.9.2	Whole Section	Technical	BASIS for NEGATIVEThese requirements appear to be repeats of those already outlined in Section 7.8.2.b hence are not needed. Items not covered in 7.8.2.b may be listed as 'should' rather than 'shall' requirements. These provisions increase audit exposure and administrative burden while duplicating existing requirements, making this a poor fit for inclusion in the normative body of API 510.b) Inspection History—For example, inspection reports and data for each type of inspection conducted (e.g. internal, external, thickness measurements) and inspection recommendations for repair inspection reports shall document the date of each inspection and/or examination, the date of the next scheduled inspection, the name of the person who performed the inspection and/or examination, the serial number or other identifier of the equipment inspected, a description of the inspection and/or examination performed, and the results of the inspection and/or examination.	Delete section as it is a repeat of requirements already covered.	Accepted remove section 7.9
688	Ray Konet	Negative	7.9.2	All	Technical	This section is not integrated into the contents of 7.8.2 b). There is overlap inconsistency, and more new requirements. Do we really need to write the corrosion rate of components on the external inspection report.	Negative. Merge details into appropriate sections of 7.8 or vice-versa	Noted: section 7.9 removed SK 678
689	Denizhan GUL	NonVoter	7.9.2	g)	General	This section may include corrosion rates, estimated remaining life, and the next inspection interval.		Noted: section 7.9 removed SK 678
694	Grady Hatton	Negative	7.9.2	Section	Technical	While I can agree on the concept the first sentence states, "Reports shall include at a minimum the following". If reporting a visual inspection then (g) would not be addressed.	Basis of Negative - Reports shall include at a minimum the following information as it pertains to the type of inspection performed.	Accepted remove section 7.9
690	Edward Sanchez	Negative	7.9.2	Intro to listing	Technical	Basis for negative. This is a strong "shall" with the numerous details that follow - one of which mentions "if available." This either needs to be a "should" statement, or some things need to be eliminated from the list such as size, capacity, year/code of construction, corrosion rates of all major components, and drawings. Imagine being required to report all of these things for an external visual inspection.	Either revise the list or change the "shall" to a "should."	Noted: section 7.9 removed SK 678
692	Jared Williamson	Negative	7.9.2	1st sentence	General	Not sure I agree with the "shall", but I might be able to be convinced.	Change to "should"	Noted: section 7.9 removed SK 678
693	William Martin	Negative	7.9.2	1	Technical	Not all of these items apply to every inspection. Often, NDE is done as its own inspection task and need not be appended to some other report. Signatures should not be required unless electronic signatures are accepted.	Change "shall" to "should."	Noted: section 7.9 removed SK 678

691	Edward Sanchez	Negative	7.9.2	Bullet (d)	Technical	Requiring "size, capacity, year & code of construction, and materials of construction" for every report - even every internal visual report - seems unnecessary. These factors are typically available in the equipment manufacturer's form (e.g., U-1) or in the equipment file. Even if they are not, there is no need to repeat them in every inspection report.	Remove "size, capacity, year & code of construction, and materials of construction" from bullet (d).	Noted: section 7.9 removed SK 678
695	Leslie Ward	Negative	7.9.2 d)	1st	Technical	Add the following to item d. name, title, or function of the vessel, the equipment ID. Note any conflicting information between what is marked on the vessel, on inspection drawings, and/or P&IDS. d) description of the vessel (number, size, capacity, year & code of construction, materials of construction, service history, etc.), if available;	Change item d to state: "d) description of the vessel (name, title, or function of the vessel, the equipment ID or number, size, capacity, year & code of construction, materials of construction, service history, etc.), if available; Document if any of this information is not the same information between what is marked on the vessel, on inspection drawings, and/or P&IDS."	Noted: section 7.9 removed SK 678
696	Leslie Ward	Negative	7.9.2 e)	1st	Technical	Add the following to item e. All conditions shall be documented, good or bad. e) list of components inspected, conditions found, and deficiencies found;	Change item e to state: "e) list of components inspected, conditions found (good or bad), and deficiencies found;	Not accepted. section 7.9 removed SK 678
697	Leslie Ward	Negative	7.9.2 j)	1st	Technical	Consider including the all of the same information for the person who performed the inspection not just the person responsible. j) name, company, certification number and signature of the authorized inspector responsible for the inspection;	Change items j to state: "j) name, company, certification number, and signature of the person who performed the inspection and the authorized inspector responsible for the inspection;"	Noted: section 7.9 removed SK 678

698	Robert Sladek	NonVoter	7.9.3	New	Technical	Add a sub-section on the contents of continuous inspection summary report	7.9.3 Inspection Continuous History Report (ICHR)A summary of historical information concerning the pressure vessel or pressure-relieving device should be compiled and maintained by the owner-user for the service life of the equipment. The ICHR should contain the following data and information:a) Equipment Identification and Design Data - For example: equipment identifier, design conditions, material specifications, service history including operating parameters, and RBI assessment parameters.b) Historical Inspection Data - For example: summary of prior inspection records, repair recommendations and dispositions, CCD parameters, IOW limits, and identified damage mechanisms.c) Current Inspection Findings - For example: Inspection plan requirements, as-found condition documentation, cleaning methods employed, significant inspection observations, and NDE results.[See second comment for other 2 bullets]	Noted: section 7.9 removed SK 678
699	Robert Sladek	NonVoter	7.9.3	New	Technical	Part 2: Add a sub-section on the contents of continuous inspection summary report	d) Condition Assessment and Analysis - For example: calculated corrosion rates, remaining life determinations for components, comparison of observed corrosion patterns to anticipated degradation, repair scope specifications, FFS evaluations, and metallurgical examination results.e) Recommendations and System Impacts - For example: future inspection interval and method recommendations, repair or replacement strategies, implications for associated equipment and piping systems, operational exposure considerations, and proposed updates to CCD, IOW, and RBI assessments.	Noted: section 7.9 removed SK 678
678	Brian Boss	Negative	7.9	all	Technical	unnecessary changes	leave as original wording	Accepted remove section 7.9
679	Mark Geisenhof	Negative	7.9	All	Technical	too prescriptive. 7.8.2 already covers major information that needs to be covered.	Delete section	Accepted remove section 7.9

680	Ibrahim Kodssi	NonVoter	7.9	7.9	Editorial	Make it a standalone section after section 8.	Make it a standalone section after section 8.	Noted: section 7.9 removed SK 678
681	Terry Blue	Negative	7.9	Whole section	Technical	While the intent to improve inspection reporting clarity is understandable, the proposed Section 7.9 adds redundancy and rigidity without improving inspection quality or safety. For example, a baseline external inspection could be cited as non compliant for lacking calculated corrosion rates, appended photographs, or exhaustive vessel descriptions, even though such information is technically irrelevant and not required elsewhere in API 510. Similarly, minor observations could be forced into "deficiency" and "disposition" workflows that the code already addresses more appropriately in other sections. These provisions increase audit exposure and administrative burden while duplicating existing requirements, making this a poor fit for inclusion in the normative body of API 510.	Basis for Negative - Delete this section.	Accepted remove section 7.9
685	Ray Konet	Negative	7.9.1	All	Technical	This section is not integrated into the contents of 7.8. There is overlap and inconsistency.	Negative. Merge details into appropriate sections of 7.8	Noted: section 7.9 removed SK 678
700	Abhishek Gupta	NonVoter	8.1	8.1.1 General	Technical	"Repairs to PRDs should be in accordance with API RP 576 and the approved relief valve QA manual. The repair organization shall follow all applicable safety requirements as designated in 5.3."- Shall we remove this sentence about PRDs as the PRDs are not in scope?		noted no change. This is captured by "applicable construction or repair code".
701	Phillip Loya	AffirmativeWithComment	8.1.1	Paragraph 1	General	Since "and Pressure Relieving Devices" is being removed from the Section 8 title. Recommend removing the 2nd sentence "Repair to PRDs.....". Additionally, should the third sentence be removed or at least the callout updated to "4.3"?	"All repairs and alterations to pressure vessels shall be performed by a repair organization in accordance with the applicable principles of the ASME BPVC or the applicable construction or repair code and the equipment specific repair plan prepared by the inspector or engineer. The repair organization shall follow all applicable safety requirements as designated in 4.3"	noted no change due to other comments
702	Christopher Archie	Negative	8.2.3	8.2.3 d)	Technical	Add without backing strips. Or remove "with backing strips".	All longitudinal seams in the repair band are full-penetration butt welds with or without backing strips with the design joint efficiency and inspection consistent with the appropriate code.	Accepted in Principle
703	Christopher Archie	Negative	8.2.3	8.2.3 d)	Technical	Add without backing strips. Or remove "with backing strips".	All longitudinal seams in the repair band are full-penetration butt welds with or without backing strips with the design joint efficiency and inspection consistent with the appropriate code.	Noted. Duplicate comment.
704	Edward Sanchez	Negative	8.2.3	Bullet (d)	Technical	Requiring a backing strip for a lap band repair would seem to get in the way of the repair. Can the vessel be considered the backing strip? If so, there's no need to add this phrase.	Remove the addition "with backing strip."	Accepted

705	Keneth Marden	Negative	8.2.3 d)	d)	Technical	What is the technical basis for requiring backing strips? There are cases when backing strips are not necessary, not practical or not desirable.	Delete the proposed addition requiring backing strips in longitudinal seams.	Accepted
706	Jared Williamson	Negative	8.5.2	Title & 1st sentence	General	It is called "local" in PCC-2 and "local non-circumferential" in WRC 452.	If it is changed lets make sure it is consistent.	Accepted
707	Brian Boss	Negative	8.5.2	all	Technical	unnecessary changes - keep "local" PWHT terminology	leave as original wording	not accepted Task Group determined this edit: 8.5 PWHT 8.5.2 Local Spot PWHT Local non-circumferential (aka "spot" or "bullseye") PWHT may be substituted for 360° circumferential (or banding) PWHT on local repairs on all materials, provided the following precautions are taken and requirements are met. a) The application is reviewed, and a procedure is developed by an engineer experienced in the appropriate engineering specialties. b) The suitability of the procedure shall be evaluated considering the following factors: 1) base metal thickness; 2) decay thermal gradients; 3) restraint from adjacent components
708	Katie Burkle	NonVoter	8.9.1	Figure 1	Editorial	Figure makes reference to API 579. I'm guessing this should be API 579-1/ASME FFS-1. In the same shape it references section 3 of 579. Is that needed?	Update figure and supply back to API. If no one has the software to update the figure, API can do so but will just need a list of the updates.	ME: Accept (see also SK 745) this should be updated as suggested. However, I do not have the figure or the software to do so.
745	Michael Schmidt	NonVoter	Figure 1	Figure 1	Editorial	Decision diamond in flow chart does not indicate an action for a "no" answer in the second question diamond.	Provide instruction for a no answer to "Jurisdiction within which the vessel operates, allows rerates using the latest edition of the ASME Code allowable stress?" likely this would tie to the line from no of the first diamond.	ME: Accept with SK 708 - Need API to edit figure.
710	Brian Boss	Negative	9.2.4	all	Technical	unnecessary changes	leave as original wording	Accepted in Principle. Remove caution statements and keep 'C' deleted
715	Christopher Archie	Negative	9.2.4	a) Caution:	Technical	Change 50°F to 10°F. The CUI range is 10°F - 350°F.	Caution: While operating (process) temperatures may be outside the high risk zone for CUI(10 °F - 350 °F), most vessels cycle to ambient temperature at some frequency. It is critical to recognize that cyclic systems can be at significant risk of CUI, so insulation removal to inspect for CUI may still be necessary.	noted, content removed with SK 710

717	Christopher Archie	Negative	9.2.4	a) Caution:	Technical	Change 50°F to 10°F. The CUI range is 10°F - 350°F.	Caution: While operating (process) temperatures may be outside the high risk zone for CUI(10 °F - 350 °F), most vessels cycle to ambient temperature at some frequency. It is critical to recognize that cyclic systems can be at significant risk of CUI, so insulation removal to inspect for CUI may still be necessary.	Noted. Duplicate comment.
709	Darryl Godfrey	Negative	9.2.4	P4	Editorial	Delete as it is a repeat of P2.	Delete	noted, content removed with SK 710
711	David Wang	Negative	9.2.4	Caution	Editorial	There are two identical Caution notes in section 9.2.4, one after a) and the other b). Suggest deleting the one following a) to eliminate the repetition.	Delete the first caution note: Caution: While operating (process) temperatures may be outside the high risk zone for CUI (50 °F - 350 °F), most vessels cycle to ambient temperature at some frequency. It is critical to recognize that cyclic systems can be at significant risk of CUI, so insulation removal to inspect for CUI may still be necessary.	noted, content removed with SK 710
712	Christopher Archie	Negative	9.2.4	9.2.4	Editorial	The caution statement is included after paragraph a) and paragraph b). Is it the intent to leave the same statement in both locations?	I would remove the one after a) and leave the one at the end of the section.	Noted. Duplicate comment.
713	Scott Sinclair	Negative	9.2.4	a) and b)	Technical	The caution statement following bullets a) and b) both state "...so insulation removal to inspect for CUI may still be necessary." Any time removal of insulation is mentioned, it is critical to also state that when it is removed, it must be properly replaced as quickly as possible.	Add the following text after caution. "When insulation is removed to perform inspection, replacement of all insulation and weather jacketing removed is critical and shall be performed in the shortest possible timeframe following removal. Material of the same type, thickness and layering shall be installed. Care shall be taken to ensure proper watershed of all weather jacket materials."	not accepted due to other edits - content removed with SK 710
714	Edward Sanchez	Negative	9.2.4	Caution statement	Editorial	The Caution statement is duplicated in both bullets.	Remove the caution statement from one of the bullets, preferably bullet (b).	noted, content removed with SK 710
716	Christopher Archie	Negative	9.2.4	9.2.4	Editorial	The caution statement is included after paragraph a) and paragraph b). Is it the intent to leave the same statement in both locations?	I would remove the one after a) and leave the one at the end of the section.	noted, content removed with SK 710

718	Abhishek Gupta	NonVoter	9.2.4	b)	Editorial	Caution for CUI is already moved after a). It's repeat after b)	Remove "Caution: While operating (process) temperatures may be outside the high risk zone for CUI (50 °F --- 350 °F), most vessels cycle to ambient temperature at some frequency. It is critical to recognize that cyclic systems can be at significant risk of CUI, so insulation removal to inspect for CUI may still be necessary." after b)	noted, content removed with SK 710
720	Darryl Godfrey	Negative	9.2.5.2	P1 bullet a)	Technical	BASIS for NEGATIVEWhy are PRDs excluded from RBI Assessments?	Retain original text.	Accepted Retain original text
719	Ibrahim Kodssi	NonVoter	9.2.5.2	9.2.5.2	Technical	Add the following "D) Even when Risk Based Inspection (RBI) methodologies are applied, inspection intervals shall not exceed the remaining life of the equipment."	Add the following "D) Even when Risk Based Inspection (RBI) methodologies are applied, inspection intervals shall not exceed the remaining life of the equipment."	Not accepted
721	David Wang	Negative	9.2.5.3	Item a), 2nd and 3rd sentences	Technical	The second sentence first allows the owner-operator to not classify vessels into risk classes. But then it immediately refers to "higher-risk vessels", which implicitly assumes classification exists. The third sentence then reintroduces lower/higher classification, creating inconsistency. Suggest rewriting the 2nd and 3rd sentences to improve clarity.	Suggested revision of the 2nd and 3rd sentences: At a minimum, the owner-operator shall define and document criteria for distinguishing lower- and higher-risk vessels. If additional risk classes are not established, inspection requirements and intervals for higher-risk vessels shall be applied.	Not accepted
722	Brian Boss	Negative	9.2.6	all	Technical	unnecessary changes	leave as original wording	Accepted Revert to original
725	Ray Konet	Negative	9.4	1s	Technical	This section is alternative rules for production, are we really endorsing no examination of relief devices	Maintain existing requirement as lack of credibility.	Accepted: revert to original
729	Brian Boss	Negative	9.4 old	all	Technical	unnecessary changes This is the Safety Relief devices section. Why eliminate entirely?	leave as original wording	noted See SK725 revert to original
727	Brian Boss	Negative	9.4 new and 9.5	all	Technical	unnecessary changes	leave as original wording	Accepted SK725 revert to original
728	Abhishek Gupta	NonVoter	9.4 & 9.5	Reference	General	Should these two sections just refer to section 7.8 and 7.9 instead of repeating the content?		noted SK725 revert to original

726	Leslie Ward	Negative	9.4	1st	Technical	Item b) in the first sentence, change "safety relief device" to "safety relief valve," OR "pressure-relieving device." See comments for the title for section 6.6.	Change item b) to state: "Examples of information that may be maintained are vessel identification numbers; safety reliefvalve information; and the forms on which results of inspections, repairs, alterations, or reratings are to be recorded."ORChange item b) to state: "Examples of information that may be maintained are vessel identification numbers; pressure-relieving device information; and the forms on which results of inspections, repairs, alterations, or reratings are to be recorded."	noted SK725 revert to original
723	Terry Blue	Negative	9.4	Added Text	Technical	In summary, adding these inspection history and reporting provisions to API 510 would introduce redundancy, over prescription, and increased compliance exposure without improving inspection effectiveness. For example, a routine external visual inspection with no degradation could be deemed non compliant for not reporting corrosion rates for all major components or for not appending photographs that were unnecessary or not taken. Likewise, baseline inspections or vessels in benign service could be questioned for lacking corrosion rate calculations where insufficient data exists. Requiring formal documentation of the disposition of every inspection recommendation could also elevate routine monitoring remarks into administratively burdensome "deficiencies." Collectively, this shifts API 510 toward a checklist driven reporting template, duplicates existing requirements elsewhere in the code, and increases audit and jurisdictional risk without adding technical rigor or safety benefit.	Delete the added text. Review with duplication for 7.9.	Accepted revert to original
724	Jared Williamson	Negative	9.4	Bullet C	General	Earlier in the document references to RBI assesments being in compliance with API RP 580 have been removed.	Need to align on which direction we are going with it.	Noted: C is being removed
730	Robert Sladek	NonVoter	9.4.	P1, S1, c)	Technical	Duplicate issue from 7.8.2.b):The requirements for inspection reports are nested in the "example" of inspection history. It appears these were extracted and compiled into 9.5.2 (where they belong). Also, remove the shall statement from this example.	"c) Inspection History—For example, inspection reports and data for each type of inspection conducted (e.g. internal, external, thickness measurements) and inspection recommendations for repair."Everything else in this bullet belongs to Section 9.5.	noted SK723 revert to original

731	Robert Sladek	NonVoter	9.4.	P1, S2, d)	Technical	Add new bullet about Equipment Management Documentation records	Equipment management documentation - For example, inspection plan, completed defferral records, thickness surveys with related corrosion rate and remaining life analyses, inspection continuous history report, AI use approvals, RBI assessments (per API 580 requirements) and FFS assessments (per API 579-1/ASME FFS-1 requirements), repair and alteration authorizations.	noted SK723 revert to original
732	Jared Williamson	Negative	9.5.2	1st sentence	General	Not sure I agree with the "shall", but I might be able to be convinced.	Change to "should"	noted SK723 revert to original (the new section proposed in previous ballot was entirely removed. this comment no longer applies)
733	Leslie Ward	Negative	9.5.2 d)	1st	Technical	Add the following to item d. name, title, or function of the vessel, the equipment ID. Note any conflicting information between what is marked on the vessel, on inspection drawings, and/or P&IDS. d) description of the vessel (number, size, capacity, year & code of construction, materials of construction, service history, etc.), if available;	Change item d to state: "d) description of the vessel (name, title, or function of the vessel, the equipment ID or number, size, capacity, year & code of construction, materials of construction, service history, etc.), if available; Docuement if any of this information is not the same information between what is marked on the vessel, on inspection drawings, and/or P&IDS."	noted SK723 revert to original (the new section proposed in previous ballot was entirely removed. this comment no longer applies)
734	Leslie Ward	Negative	9.5.2 e)	1st	Technical	Add the following to item e. All conditions shall be documented, good or bad. e) list of components inspected, conditions found, and deficiencies found;	Change item e to state: "e) list of components inspected, conditions found (good or bad), and deficiencies found;	noted SK723 revert to original (the new section proposed in previous ballot was entirely removed. this comment no longer applies)
735	Leslie Ward	Negative	9.5.2 j)	1st	Technical	Consider including the all of the same information for the person who performed the inspection not just the person responsible. j) name, company, certification number and signature of the authorized inspector responsible for the inspection;	Change items j to state: "j) name, company, certification number, and signature of the person who performed the inspection and the authorized inspector responsible for the inspection;"	noted SK723 revert to original (the new section proposed in previous ballot was entirely removed. this comment no longer applies)
738	David Wang	Negative	Annex A	1st sentence	Editorial	Use semicolon instead of comma after inspection code, and change owner-operators to owner-operator's.	The following classes of containers and pressure vessels are excluded from the specific requirements of this inspection code; however at the owner-operator's discretion these items could be applied to the rules of the code:	Accepted.
737	Abhishek Gupta	NonVoter	All	All	General	Through the document , we have pressure equipment and pressure vessel used interchangeably. While aligning with the scope which includes pressure vessel, heat exchangers and components as part of this code, propose to replace "pressure vessel" with "pressure equipment" where applicable. Suggestion for thoughts.	propose to replace "pressure vessel" with "pressure equipment" where applicable.	Noted future discussion needed

746	Denizhan GUL	NonVoter	General	General	General	I couldn't understand why was the term "Probability of Failure (PoF)" changed to "likelihood" throughout the document, given that API 580 and API 581 still use the term "PoF"?	noted covered under other comment changing back to Probability	ME: Accepted in Principle, we reverted back to probability throughout
751	Jared Williamson	Negative	Whole Document	Whole Document	General	Why are all reference to RP's removed?	Leave document titles with RP in the title (example API RP 584). Obviously if there is some API legal reason we have to remove them I suppose I am ok with that.	Not accepted. This is inline with the API style guide.
752	Brian Boss	Negative	whole document	all	General	In general, I was very disappointed with the redlines being incorporated without any formal discussion from any previous ballot. This is substantially more than just "scorecard" updates from a previous revision and took "open" comments from the ballot too far by applying to the document. Discussion of substatal change needs to be done before we go this far in the document update process. Also, the original ballot did not even include the 'redline' comments which are neccessary to see as many changes are very substantial.	n/a	Noted. Nothing to action.
739	Brian Boss	Negative	Annex B	all	Technical	why normative to informative?	leave as original wording	Not accepted. Section 4.5 refers to Annex B in an informative way therefore it's informative. API can't mandate the use of the ICP program.
744	Jared Williamson	Negative	Bibliography	API 586	General	Why are we removing all reference to this RP?	No strong opinion, just curious why it was deleted. I don't see that it hurts anything to stay.	Noted. We can't reference documents that aren't published. If 586 publishes before 510 it can be added back in.
743	Brian Boss	Negative	Bibliography	all	Technical	Add API 592 - should also refer to this in the document at appropriate location	Add API 592 - should also refer to this in the document at appropriate location	Noted ME to determine appropriate action. ME: added
740	Terry Blue	Negative	Annex C and D	Note	General	The style guide does not permit requirements to be stated in notes. While this note uses "should," others in the document use non directive terms such as "may" or "can," which are more consistent with a non normative note.	Coordinate with API to determine the appropriate handling of notes in alignment with the 2025 updated style guide.	Accepted.
741	Jared Williamson	Negative	Annex E	Whole	General	Why did we remove the entire annex?	No strong opinion, just curious why it was deleted. I don't see that it hurts anything to stay.	Noted. API is in the process of removing these types of annexes from standards.
742	Brian Boss	Negative	Annex E	all	Technical	Is the entirety of technical inquiries process being abandoned???	Decision for this is probably beyond this working group - a formal code/standard should have a method to request technical inquiries... I know API committees have not upheld this but is the solution to abandon this process entirely?	Noted. The RFI process is still available.