

Title:	Alternate Inspection Deferrals	Agenda Item # 653-2049
Date:	5/16/2022	
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Purpose:	Allow for short term deferral of out-of-service API 653 inspection based on an alternate approach	
Source:	SCIMI passing similar language for API 510 and API 570 Agenda Item 653-2037 Revision 7 for simplified deferral Agenda Item 653-2046 Revision 2 for Alternate Technical Based Deferrals (Risk based)	
Revision:	0	
Impact:	Impact is positive, as operational shutdowns can be better planned and scheduled.	
Rationale:	<p>There are certain situations, particularly in refineries, where turnaround scheduling and unit outages can be significantly impactful to business and aren't based on actual corrosion rates. In recent years, SCAST moved agenda item 653-2037 for simplified, standard deferral and 653-2046 alternate technical deferrals (risk based) to publication. However, there are more than two ways to justify a tank inspection deferral. This agenda item establishes that other methods may be used.</p> <p>The proposed language is similar to the use of alternate methods to calculate tank bottom corrosion, minimum thickness, and inspection intervals. For example, Section 4.4.5 says "Quantifying the minimum remaining thickness of tank bottoms based on the results of measurement can be done by the method outlined in 4.4.5.1. Other approaches such as the probabilistic method in 4.4.5.2 may be used." If we can use other approaches for bottom plate thickness, then it would be similarly appropriate to allow alternate methods for tank internal inspection deferrals.</p>	
Proposed verbiage:	<p>The following text in black font was previously passed to publication. Proposed change to section 6.4.3 is in red font.</p> <p>3.21 Internal Inspection Deferral: an approved and documented postponement on the internal inspection due date of an in-service tank based on the procedures of Section 6.4.3.</p> <p>3.22 Internal Inspection Due Date: the date whereby a tank is scheduled to 1) be emptied of liquid and removed from service for internal inspection or 2) complete an on-stream internal inspection. The date is based on Section 6.4.2.</p> <p>6.4.3 Internal Inspection Deferral The internal inspection deferral may be applied to the Internal Inspection Due Date of tanks on a calendar-based inspection schedule. The owner/operator should review regulatory requirements and consult with the authority having jurisdiction. The internal inspection deferral may be based on the Standard Deferral of Section 6.4.3.1 or other approaches such as the Risk Based Deferral of 6.4.3.2.</p> <p>6.4.3.1 Standard Deferral The deferral may be approved by the owner/operator if all of the following conditions are met; a) The current Internal Inspection Due Date has not been previously deferred. b) The deferred Internal Inspection Due Date shall not increase the current internal inspection interval by more than 10% or twelve months, whichever is less. c) Previous internal inspection and repairs were performed in accordance with API 653, or for an initial service interval, the tank was constructed to API 650.</p>	

- d) A review of the current operating conditions, previous internal API 653 inspection if available, external API 653 inspections and routine monthly inspections have been completed with results that support a deferral. The owner/operator shall determine if modifications are needed to support the deferral.
- e) The deferral request has the written agreement of an authorized inspector and tank owner/operator.
- f) Other regulatory floating roof seal inspection intervals have been met.
- g) Cathodic protection systems, if present, are operating in accordance with API RP 651.
- h) An API 653 external inspection according to Section 6.3.2 has been completed within 12 months before the current Internal Inspection Due Date.
- i) The owner/operator has stated a valid reason for the deferral and documented in writing an assessment of alternative measures that have been considered.
- j) Updates to the tank records with deferral documentation are complete before it is operated beyond the current Internal Inspection Due Date.

6.4.3.2 Risk Based Deferral

The deferral may be approved using a risk-based inspection (RBI) procedure following the guidance in API 653 paragraphs 6.4.2.1.2 and 6.4.2.2.2. An RBI deferral requires that the owner/operator revisit the RBI assessment to determine if the risk is acceptable for the deferral extension time being evaluated.

FOR REVIEW ONLY