

# API Ballot Summary Sheet

4/5/2007

**Ballot:** RP 576 3rd Ed., Inspection of Pressure-relieving Devices

**Ballot ID:** 1078

**Start Date:** 2/19/07

**Closing Date:** 3/30/07

**Associate:** Roland Goodman

**Coordinator:** Valeen Young

**Proposal:** Approval of first ballot of API RP 576, Inspection of Pressure-relieving Devices, 3rd Edition (Ballot 576-01-07).

VotingCategory

Vote Results

<u>Voter</u>	<u>Interest Category</u>	<u>Company</u>	<u>Comments</u>	<u>Affirmative</u>	<u>Negative</u>	<u>Abstain</u>	<u>Did Not Vote</u>
Moraya Al-Gahtani	Operator-User	Saudi Aramco	No				X
S. Mohammad Ali	Operator-User	ConocoPhillips	No			X	
Gregory Alvarado	Contractor	Equity Engineering Group, Inc.	No				X
Hari Attal	Contractor	Bechtel Corporation	No	X			
Tom Bevilacqua	Contractor	Berwanger, Inc.	No				X
John Britton	Contractor	Det Norske Veritas (USA), Inc.	Yes	X			
Bill Ciolek	Contractor	UOP LLC	No	X			
David Cobb	Contractor	Fluor Enterprises, Inc.	No				X
Roger Danzy	Manufacturer	Dresser Inc.	No	X			
Denis DeMichael	Operator-User	DuPont	Yes		X		
Robert Dolejs	Contractor	UOP LLC	No	X			
Wayne Elliott	Contractor	Elliott Services, Inc.	No	X			
Eric Ellis	Operator-User	Lyondell-Citgo Refining, LP	No	X			
Chip Eskridge	Contractor	Aker Kvaerner/JBEK	Yes	X			
Robert Ferrell	Other	The National Board of Boiler & Pressure	No	X			
John Fiore	Contractor	FTS, Inc.	No	X			
Barry Friedman	Contractor	Washington Group International	No	X			
Frank Furillo	Operator-User	ExxonMobil Corp.	No				X
Mark Geisenhoff	Operator-User	Flint Hills Resources, LP	No				X
Jude Golla	Consultant		No				X
Gary Heath	Contractor	All Tech Inspection	No	X			
Philip Henry	Contractor	Equity Engineering Group, Inc.	No				X
Peter Hunt	Operator-User	Shell Canada Ltd.	No	X			
Steve Khouie	Operator-User		No	X			
Morris Kline	Contractor	HMT Inspection	Yes			X	
Owen Konski	Operator-User	Syncrude Canada Ltd.	No				X
Sook-Hyung (Sam) Kwon	Manufacturer	SK Corporation	No	X			
Ying Lai	Contractor	Farris Engineering	No				X

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	<u>VotingCategory</u>				
Dennis Layman	Operator-User	BP p.l.c.	Yes	X	
Haakon Loevaasen	Operator-User	Statoil	Yes	X	
John Ludman	Operator-User	DuPont Engineering	No	X	
Robert McMican	Operator-User	ExxonMobil Research & Engineering	Yes	X	
John McMillan	Contractor	Mechanical Integrity Inc.	No	X	
Dean Miller	Manufacturer	Fike Corporation	Yes	X	
George Milleret	Manufacturer	Myers-Aubrey Company	No		X
Rick Nichols	Contractor	Roddey Engineering Services, Inc.	No	X	
Brad Otis	Operator-User	Shell Global Solutions (US) Inc.	Yes	X	
Steven Palmer	Manufacturer	BS&B Safety Systems, L.L.C.	No	X	
Robert Pechacek	Contractor	General Electric Inspection Services	No	X	
Michael Porter	Operator-User	Chevron Corporation	No		X
John Reynolds	Consultant	Shell Global Solutions (US) Inc.	Yes	X	
Delano Richie	Contractor	PetroChem Inspection Services	No	X	
James Riley	Operator-User	Chevron Corporation	No		X
Kyle Roth	Manufacturer	Continental Disc Corporation	No	X	
Roy Schubert	Operator-User	Shell Canada Ltd.	No	X	
Robert Schwartz	Manufacturer	John Zink Company, LLC	No		X
Aubry Shackelford	Contractor	Celerity3 Engineering	No		X
Michael Shallis	Contractor	Acuren Inspection, Inc.	No	X	
Larry Siqueiros	Operator-User	Marathon Petroleum Company LLC	No		X
Ryan Sitton	Consultant	Pinnacle Asset Integrity Services	No		X
Robert Smallwood	Consultant		No	X	
Kelly Smith	Operator-User	ConocoPhillips	Yes	X	
Nick Sowa	Contractor	Conam Inspection & Engineering Service	No	X	
Charles Sprague	Manufacturer	Groth Corporation	No	X	
John Straitz	Manufacturer	NAO	No		X
Kenneth Tam	Consultant		No	X	
Roland Valdes	Contractor	Inspection Solutions, LLC	No		X
John Watson	Operator-User	The Dow Chemical Company	No		X
Colin Weil	Consultant		No	X	
Steven Wells	Contractor	Pro-Inspect Inc.	No	X	

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Alan West Edward Zamejc	<u>VotingCategory</u> Manufacturer Operator-User	Tyco Valves & Controls LP BP America Inc.	Yes Yes	X X
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	Affirmative	Negative	Abstain	Did Not Vote
<b>Balloting Totals:</b>	<b>39</b>	<b>1</b>	<b>2</b>	<b>20</b>

<b>Total Responses:</b>	<b>42</b>	
<b>Total Ballots:</b>	<b>62</b>	
<b>Response Rate (Affirmative / Total Ballots):</b>	<b>63%</b>	Must be > 50%
<b>Approval Rate (Affirmative / [Affirmative + Negative] ):</b>	<b>98%</b>	Must be > 67%
<b>Consensus:</b>	<b>YES</b>	

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### API Ballot Comments and Resolution

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	1	2	3	4	5	6
#	Voter Name (Vote)	Clause No./ Subclause No./Annex (e.g. 3.1)	Type of Comment	Comment (justification for change) by the Voting Member	Proposed change by the Voting Member	Comment Resolution
1	Chip Eskridge Aker Kvaerner/JBEK (Affirmative)	2	Technical	I would add the Red Book, NB-18. It lets you know if a PSV's spring can be changed out. Slope method, 3 point method, etc.	Add NB-18 Pressure Relief Device Certifications (Red Book)	
2	Roland Goodman American Petroleum Institute (NonVoter)	3	Editorial	The definitions used in this document should be reviewed for consistency with those in API 521. 5 <sup>th</sup> edition.		
3	Chip Eskridge Aker Kvaerner/JBEK (Affirmative)	3.1.2	Technical	Galling is more prevalent in face centered cubic (FCC) and hexagonal closed pack (HCP) structures...stainless steel, cooper, aluminum, gold, silver,	A condition whereby excessive friction between high spots resulting in localized welding with subsequent splitting and a further roughening of rubbing surfaces of one or both of two mating parts. More prevalent in low yielding materials (stainless steel, cooper, aluminum, etc.)	
4	Alan West Tyco Valves & Controls LP (Affirmative)	3.2.1	Technical	The definition in API 520 in the next edition will read as follows:	effective coefficient of discharge: The effective coefficient of discharge of a pressure relief valve is a nominal value used with an effective discharge area to calculate the relieving capacity of a pressure relief valve per the preliminary sizing equations given in this Recommended Practice.	
5	Roland Goodman American Petroleum Institute (NonVoter)	3.2.3	Editorial	Having "unless otherwise designated" at the end should not be part of the definition. This type of information should be put in a note below the definition or in the body of the document where the term is used. This comment also applies to 3.2.5 defining outlet size.	inlet size  The nominal pipe size (NPS) of the relief device at the inlet connection.	

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6	Chip Eskridge Aker Kvaerner/JBEK (Affirmative)	3.3.1	Editorial	Commas after emergency and operating in last sentence.	...applicable codes for emergency, operating, and fire contingencies.	
7	Roland Goodman American Petroleum Institute (NonVoter)	3.3.3	Editorial	<p>Many of the definitions are wordy and should be revised. You should be able to take a definition and substitute it directly in the text for the word being defined.</p> <p>In this case definition explains how to use the design pressure rather than just defining the term. Preferably, this explanatory information should be in the body of the document, but it could be put in a note if it is short and concise. I suggest using the definition used in API 521, 5<sup>th</sup> edition.</p>	<p>design pressure</p> <p>Pressure, together with the design temperature, used to determine the minimum permissible thickness or physical characteristic of each component, as determined by the design rules of the pressure-design code.</p> <p>NOTE The design pressure is selected by the user to provide a suitable margin above the most severe pressure expected during normal operation at a coincident temperature, and it is the pressure specified on the purchase order. The design pressure is equal to or less than the MAWP (the design pressure can be used as the MAWP in cases where the MAWP has not been established).</p>	
8	Chip Eskridge Aker Kvaerner/JBEK (Affirmative)	3.3.6	Editorial	Overpressure is a percentage of absolute set pressure. Revise second sentence.	Overpressure is expressed in pressure units or as a percentage of absolute set pressure.	
9	Ken Gottselig Lyondell Chemical Company (NonVoter)	3.4.9	Technical	3.4.9: I suggest using the word "design" in the body of the definition (i.e. in between manufacturing and ranges).	3.4.9: I suggest using the word "design" in the body of the definition (i.e. in between manufacturing and ranges).	

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10	Haakon Loevaasen Statoil (Affirmative)	4.5.2	Editorial	"cdtp" is generally written with capital letters elsewhere in the document, also in the definition (section 3.4.7)	Change to capital letters	
11	Chip Eskridge Aker Kvaerner/JBEK (Affirmative)	4.5.2.b	Editorial	cdtp should be all caps	where the CDTP cannot be reduced to account for effects of variable back pressure (see API 520, Part 1)	
12	Chip Eskridge Aker Kvaerner/JBEK (Affirmative)	4.7.1	Technical	There are situations where the sensor is remote of the PSV to account for both static and dynamic overpressure scenarios. Add i.	i. where remote sensing is desired to protect against overpressure in both static and dynamic scenarios.	
13	Haakon Loevaasen Statoil (Affirmative)	4.7.2	Technical	Bullet point a - The term "dirty" is not very precise, and the limitation is generally not only related to "dirty" fluids but also to fluids which have a potential to solidify under certain conditions (hydrates, wax, ice, etc)	change to "in service where fluid is dirty or where there is a potential for solidification (e.g. hydrates, wax, ice,) in the pilot or sensing line,....."	
14	Chester Brooke Shell Global Solutions (US) Inc. (NonVoter)	4.9.1	Technical	Last paragraph - "Rupture disks normally require a rupture disk holder although some disk designs can be installed between standard flanges without holders." The comment is that this will not be in compliance for ASME Code stamped devices as written.	Alter as follows "...although some non-ASME disk designs can be installed....."	
15	Chip Eskridge Aker Kvaerner/JBEK (Affirmative)	4.9.2.2	Editorial	My experience is 80 or 90% is typical. Never seen 85%	...higher ratio (generally 80-90%) of system operating pressure to disk burst pressure.	

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16	Dean Miller Fike Corporation (Affirmative)	4.9.2.3	Editorial	Second paragraph - Comment implies incorrectly that a composite disc offers longer service life due to the seal material selection. This is true of all discs and not a "feature" of composite discs.	Delete "and may offer a longer service life because of the corrosion resistant properties of the seal material selected"	
17	Dean Miller Fike Corporation (Affirmative)	4.9.2.4	Editorial	Second paragraph - Thicker material has nothing to do with corrosion resistance or vacuum capability of a reverse acting disc. Other concepts thrown in that aren't really related.	"Because the reverse-acting rupture disk is actuated by pressure on the convex side, the stresses in the disc are generally compressive and tend to provide longer service life un pressure/vacuum cycling conditions" WAS "Because the reverse-acting rupture disk is actuated by overpressure on the convex side, thicker disk materials may be used, thereby improving corrosion resistance, eliminating the need for vacuum support, and providing longer service life under pressure/vacuum cycling conditions and temperature fluctuations."	
18	Edward Zamejc BP America Inc. (Affirmative)	4.9.3	Editorial	Last paragraph ASME reference is given [?]	ASME reference on rupture disk devices is [15]	
19	Haakon Loevaasen Statoil (Affirmative)	4.9.3	Technical	Last paragraph - Last sentence: Specify correct ASME reference.	Correct reference is ASME Section VIII Paragraph UG-127. This should be included in the paragraph	

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20	Haakon Loevaasen Statoil (Affirmative)	4.9.4	Technical	<p>Last paragraph ("CAUTION") mentions replacement of disks at maintenance intervals. The standard should consider including some guidance with respect to determining the replacement period.</p> <p>An appropriate replacement period should be established before a rupture disk device is put into service. The following factors should be considered:</p> <p>Type of disk, materials, operating ratio (operation pressure/set point), temperature conditions, service conditions. Such guidance is included in the current version of ISO 4126-6, appendix B (which is referred to by European pressure vessel codes).</p>	Consider including some guidance for determining the replacement period.	
21	Dean Miller Fike Corporation (Affirmative)	4.9.4	Editorial	Fourth paragraph - This doesn't seem to make sense. I've never heard of anyone doing anything special regarding piping (other than listed below)	Delete "the piping arrangement may be more complicated due to the need for support with low burst pressures or high back pressures (see 4.9.1.5) and"	
22	Dean Miller Fike Corporation (Affirmative)	4.9.4	Technical	Fifth paragraph - The use of graphite discs under valves is in violation of all PR standards. The means of protection describe here and in some old graphite product literature are piping traps and screens that have no mechanism for verification for effectiveness. They will likely also cause violation of the 3% rule. RP520pt1 paras 2.3.3.1 and 2.3.3.5.2 clearly express that prebulged and graphite discs are not suitable for installation upstream of a PRV	Delete "unless a means of protecting the pressure relief valve inlet from the fragments is provided"	
23	Ken Gottselig Lyondell Chemical Company (NonVoter)	5.5	Editorial	5.5 Figure illustrations are defined twice. There is the set in red print and the set in bold black below it.		

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24	Haakon Loevaasen Statoil (Affirmative)	5.6	Editorial	typo in the header: "Of" should be "of"	change to "of"	
25	Chip Eskridge Aker Kvaerner/JBEK (Affirmative)	5.6	Editorial	Misapplication Of Materials has a number zero in Of and should be the letter O	5.6 Misapplication Of Materials	
26	Haakon Loevaasen Statoil (Affirmative)	5.8.3	Technical	The NOTE says that relief valves should be installed with a vertical orientation. This is correct, and the ASME code provides additional guidance. ASME VII Appendix M describes under what conditions an orientation other than vertical may be acceptable.	Include a reference to ASME VII Appendix M	
27	Haakon Loevaasen Statoil (Affirmative)	5.8.3	Technical	The NOTE at the end of this section is not really related to anything that is done during installation, which the header of this section refers to. The note is more a reflection of established design practice and governed by the ASME code (se previous comment)	Consider moving the contents of this note to section 5.11 which addresses some of the layout/installation requirements. If so, the header should be changed to include pressure relief devices in general, not only rupture disks.	
28	Chip Eskridge Aker Kvaerner/JBEK (Affirmative)	5.9	Technical	ASME Section VIII, Appendix M also provides guidance.	Add ASME Section VIII, Appendix M to second sentence.	
29	Haakon Loevaasen Statoil (Affirmative)	5.11	Technical	Last sentence (under "f") refers to API RP 520. There should be a general reference to API RP 520 in this section, not only under point "f". API RP 520 part II provides general requirements for installation of pressure relief devices.	Make a general reference to API RP 520 in this section	

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30	Edward Zamejc BP America Inc. (Affirmative)	5.11 e	Editorial	There is an extra e)	delete e) at start of paragraph	
31	Dean Miller Fike Corporation (Affirmative)	5.11b	Editorial	Most likely result will be leakage	Add "leakage or possibly"	
32	John Britton Det Norske Veritas (USA), Inc. (Affirmative)	6.2.12	Editorial	2 sentence - move the word "and"	Damaged springs and bellows should be replaced.	
33	Barry Weber Lyondell Chemical Company (NonVoter)	6.2.12	Technical	Components designed for single use (gaskets [both metal and sheet] and soft goods) are all deformed upon installation and attain a permanent set in shape. Reuse of deformable components designed for single use should not occur due to the decreased deformation that is attained upon reuse. Such decreased deformation results in reduced sealing load and potential leak failure of the component.	Parts that are worn beyond tolerance or damaged should be replaced or reconditioned. Damaged springs, bellows and single use components (snap rings, gaskets and soft goods) should be replaced. All single use components (snap rings, gaskets and soft goods), even those that are apparently undamaged, should be replaced. ...	
34	Haakon Loevaasen Statoil (Affirmative)	6.2.12	Editorial	1. paragraph, 2, sentence: "Damaged springs, bellows and should be replaced"	Change to "Damaged springs and bellows should be replaced"	
35	Denis DeMichael DuPont (Negative)	6.2.17	Technical	The description of the in situ testing isn't correct. The hydraulic device applies a supplemental upward force on the pressure relief valve "stem" not the pressure relief valve. Also, the use of the term "lift" leaves the impression that the disk is lifted off the seat. Is this accurate?	Correct the omission of the word "stem."	

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36	Ken Gottselig Lyondell Chemical Company (NonVoter)	6.2.17	Editorial	6.2.17 (page 32) The heading of the section references "Precautionary Measures to Consider" but the a, b, c d, e & f provide examples of potential hazards.	suggest changing the heading text to "There are several potential hazards to take into account when applying the hydraulic test method":	
37	Haakon Loevaasen Statoil (Affirmative)	6.2.17	Editorial	3. paragraph: "since the rupture disk is exposure to pressure....."	Change "exposure" to exposed"	
38	Haakon Loevaasen Statoil (Affirmative)	6.2.17	Technical	The last part of the section refers to "precautionary measures" to consider when applying the hydraulic test measures. Are these really precautionary measures? Seems to me this is a list of potential problems to consider	Reconsider the use of the words "precautionary measures". Should i be "potential problems"?	
39	Denis DeMichael DuPont (Negative)	6.2.18	Technical	Same comment as 6.2.17.		
40	Barry Weber Lyondell Chemical Company (NonVoter)	6.2.4	Editorial	Paragraphs "f" through "l" are not labeled properly.	Paragraphs "a" and "f" should be combined into paragraph "a". Paragraphs "g" through "l" should be renamed "b" through "g".	
41	Ken Gottselig Lyondell Chemical Company (NonVoter)	6.2.6	Technical	6.2.6: Should this section offer thermography as a possible method of inspection for plugging	suggest adding thermography as a possible inspection method	
42	Kelly Smith ConocoPhillips (Affirmative)	6.2.7	Editorial	The text of this section describes the necessary practices so there is no need to state "Follow the requirements of the latest version of NB-23, Section RB 8600".	Delete the sentence "Follow the requirements of the latest version of NB-23, Section RB 8600".	

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43	John Britton Det Norske Veritas (USA), Inc. (Affirmative)	6.2.7 e	Editorial	make clear if this a "should" or a "shall"	...disks should be handled....	
44	Chip Eskridge Aker Kvaerner/JBEK (Affirmative)	6.2.8	Technical	I think this is an excellent time to set a standard on when test frequencies can be relaxed. NB-23 doesn't give enough guidance and industry looks to API for a standard. I've seen as-found pops be as much as 200%...I pull test frequency back to 1 yr. If I got 2 consecutive tests at no worse than 125% of set pressure, I increased my next test date by 1 yr.  Change second paragraph to the following.	If the "as-found" pop pressure is greater than 150% of absolute set pressure, then the next scheduled inspection should be pulled back to 1 yr or the next planned shutdown, whichever is longer. If the "as-found" pop pressure is not greater than 125% of absolute set pressure on two consecutive tests, then the interval to the next inspection can be increased by 1 yr.	
45	Denis DeMichael DuPont (Negative)	6.27	Technical	This section duplicates the guidance in NBIC. The guidance for threaded valves was based on practices used by commercial relief valve repair shops. The title of this section is Transportation of Valves to Shop. Do we really expect threaded valves to be packaged and cushioned for a trip from the field to an on site repair shop? (Negative Ballot)	Consider guidance for on site and off site shipping for threaded valves. I would think "careful handling" of threaded valves on site would be sufficient.	
46	Ken Gottselig Lyondell Chemical Company (NonVoter)	6.4	Technical	If the intent is to allow RBI to define intervals, the maximum 10 year value quoted here needs to say the following  In API 510 [1], the subsection on pressure-relieving devices establishes a maximum interval between device inspections or tests of 10 years "unless qualified by a RBI assessment".	Add "unless qualified by a RBI assessment"	

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47	Kelly Smith ConocoPhillips (Affirmative)	6.4.1.4	Technical	We ran RBI on relief valves both ways and if you consider leakage, it penalizes you to the point of no benefit. The purpose of the valve is to operate when needed. If a leaking valve is considered an environmental or safety event, then a leak detection program should be put into place. It should have nothing to do with the frequency of testing to ensure functionality  mrb	Delete the second 1 sentence paragraph "The assessment should also consider the probability that a pressure relief device will leak in-service and the potential environmental and economic consequences associated with this leakage during normal operation."	
48	Ken Gottselig Lyondell Chemical Company (NonVoter)	6.5.2	Technical	would like to see a better definition of time other than "temporarily". The interpretation of this word could have a very wide range		
49	Ken Gottselig Lyondell Chemical Company (NonVoter)	7.3.2	Technical	Many of these items should be done only by an engineer.	Add another section that defines the items that only an engineer can do.	
50	Haakon Loevaasen Statoil (Affirmative)	7.3.2.1	Technical	point a.  State the point more specifically	add to point a:  "for relief devices and connected piping"	
51	Haakon Loevaasen Statoil (Affirmative)	7.3.2.1	Technical	Add another point after point h	"i. To ensure that the relief devices are designed, located and installed according to the requirements in the design codes"	
52	Roland Goodman American Petroleum Institute (Non-voter)	Bibliography	Editorial	API 510 should be a normative reference listed in Section 2 since 6.4 requires intervals be set per API 510.	Move API 510 to the Section 2.	

### API Ballot Comments and Resolution

Ballot: RP 576 3rd Ed., Inspection of Pressure-relieving Devices	Proposal: Approval of first ballot of API RP 576, Inspection of Pressure-relieving Devices, 3rd Edition (Ballot 576-01-07).	Ballot ID: 1078	Date: April 6, 2007
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	1	2	3	4	5	6
#	Voter Name (Vote)	Clause No./ Subclause No./Annex (e.g. 3.1)	Type of Comment	Comment (justification for change) by the Voting Member	Proposed change by the Voting Member	Comment Resolution
53	Robert McMican ExxonMobil Research & Engineering (Affirmative)	Equations 3.1 to 3.6	Technical	It appears that the equation numbers have been shifted. What happened to the original equation 3.1.		
54	Brad Otis Shell Global Solutions (US) Inc. (Affirmative)	General	Technical	Comments submitted by Chester Brooke separately		
55	Haakon Loevaasen Statoil (Affirmative)	General	Editorial	API RP 520 is referred to in the text as "API 520". Should be "API RP 520"	Replace "API 520" with "API RP 520" throughout the document	
56	Chip Eskridge Aker Kvaerner/JBEK (Affirmative)	Table of Contents	Editorial	4.9.1 General missing from TOC  5.6 Zero in Of.	4.9.1 - General 4.9.2 - Types of Rupture Disk Devices 4.9.3 - Applications 4.9.4 - Limitations 5.6 Misapplication Of Materials	
57	John Reynolds Shell Global Solutions (US) Inc. (Affirmative)	576	Technical	Comments sent under separate cover (red-lined paper)	Comments sent under separate cover (red-lined paper)	
58	Morris Kline HMT Inspection (Abstain)		Other	I do not feel qualified to cast a knowledgeable vote on this item.		

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	1	2	3	4	5	6
#	Voter Name (Vote)	Clause No./ Subclause No./Annex (e.g. 3.1)	Type of Comment	Comment (justification for change) by the Voting Member	Proposed change by the Voting Member	Comment Resolution
59	Dennis Layman BP p.l.c. (Affirmative)		Technical	Refer to comments submitted by Edward Zamejc.		