

Update from TF chair- T88.11

- During the July 2021 TCC Meeting John Byrne advised the committee that the industry NDT Level III's had a few questions related to the applicability and requirements for Hydrostatic Leak Testing. The committee assigned Mr. Byrne an action item "to meet with the Level III's and have a list of questions for the TCC by the August 2021 TCC monthly call".
- During the August 26th TCC call the following questions provided by the Level III's were reviewed:
 - Could other inspections rather than Hydrostatic Leak Test be used as a step in the initial qualification of the tank car? Is this the right test for the activity?
 - What inspection and tests as listed and prescribed in M-1002 does the Hydrostatic Leak Test (HLT) technique apply to? Various other NDT Methods and Techniques are clearly prescribed, such as *Radiographic Testing*, but the prescription of Hydrostatic Leak Testing cannot be found. Is the assumption to be made that any reference to *Hydrostatic Testing* is to mean *Hydrostatic Leak Testing*?
 - Has a target leak rate been identified? If so, what is the Leak Rate? Needed to establish the flaw specimen design.
 - What is the Acceptance and Rejection Criteria for the various tests? Currently there is pressure change rejection criteria defined but the amount or presence of leakage is not clearly listed. Assumption is made that any observable leakage is rejected.
 - Can safety steps be added to the procedures as listed in Appendix D or other places so that HLT are not inspecting vessels at a close distance in pressures above the working pressure?
 - Currently Leak Testing procedures generally prohibit pressurizing any device or component above its operating pressure.
- After a discussion on the history and value of hydrostatic testing for initial qualification the tank car tank, the committee agreed that a second charge should be added to the HTL working group. The working group was asked to "consider alternatives to hydrostatic testing of welded joints of tank car tanks".
- With respect to the applicability of HLT, the committee agreed that HLT applied to the initial qualification of exterior heater coils and the ongoing requalification of interior heater coils that utilize liquid for heating the commodity.
- The committee indicated that the acceptance criteria for HLT was "no visible indication of leakage during the test" and encouraged the working group to add safety steps to the existing Hydrotest procedures.

- Our industry Level IIIs are now focused on developing personnel qualification requirements. These requirements will include training curriculum, a written exam and practical demonstration requirements. The level IIIs have expressed concerns related to safety if realistic pressures are used during the practical exam.
- Since the HTL procedures for coils already exist in Appendix D, they should be considered prequalified and exempt from the essential variable requirements in section 1.18 and 5.1 of Appendix T. (No Reliability and Sensitivity Analysis or Procedure Qualification Requirements). This needs to be clarified in Appendix T.
- Our NDT Level IIIs believe that the applicability of both VT and HLT need to be clearly outlined (prescribed) in Appendix D before implementation deadlines are created. The RSI would like to request that the deadline (1/1/2022) for implementation of these NDT requirements as stated in CPC-1375 is revised to six months after the publication of these new requirements in Appendix D.