



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

AA83-1
PDR

MAY 21 1984

MEMORANDUM FOR: Guy A. Arlotto, Director
Division of Engineering Technology, RES

FROM: J. Nelson Grace, Director
Division of Quality Assurance,
Safeguards, and Inspection Programs
Office of Inspection and Enforcement

SUBJECT: ENDORSEMENT OF THE WINTER 1982 ADDENDA
INCORPORATING ANSI/ASME NQA-1-1979

REFERENCE: Memorandum from J. M. Taylor to G. A. Arlotto
Dated August 24, 1983, subject as above

In the referenced memorandum, we indicated that the DQASIP staff was in the process of narrowing the choices on the approach to be used in endorsing ANSI/ASME NQA-1-1979, "Quality Assurance Program Requirements for Nuclear Facilities," as it relates to the Winter 1982 Addenda to the ASME Code. This is to advise you of the position we have reached on this matter.

We recommend that you proceed with your revision to 10 CFR 50.55a, incorporating by reference the Winter 1982 Addenda without exception. Our staff has determined that taking exceptions to the QA provisions of these Addenda is not practical at this time.

Our primary reason for adopting this approach is that there have been a large number of additions to NQA-1 since the 1979 version was published. Our staff position on NQA-1, which will appear in Revision 3 to Regulatory Guide 1.28, is formulated around the 1983 version of NQA-1 including these changes. The supplemental provisions that might be necessary to assure consistency between the Code and the staff position on ANSI/ASME NQA-1-1983 would unduly burden the 10 CFR 50.55a rule revision. We have determined that a more practical approach would be to use the regulatory positions of Revision 3 to Regulatory Guide 1.28, in conjunction with the Code, where the Code does not address all the applicable activities of NQA-1-1983 in sufficient detail, as has been past practice. This approach with regard to endorsing the Winter 1982 Addenda does not imply that we have found the Code's QA requirements to be equivalent to the provisions of our current and proposed revisions to both Regulatory Guides 1.28 and 1.33; nor should it be construed that we feel the Winter 1982 Addenda QA requirements are adequate in terms of accepting the ASME/NB nuclear accreditation program as outlined in the NRC/ASME/NB Exchange of Correspondence dated February 4, 1981. It is our position that until the Code QA requirements are equivalent to the pertinent NRC regulations and regulatory guides, applicants and licensees should commit to Regulatory Guides 1.28 and 1.33 or

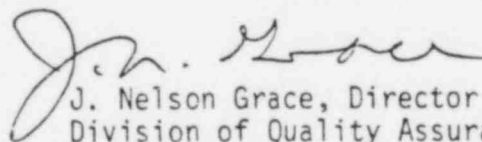
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provide acceptable alternatives, as applicable, for either CP or OL, and continue to fulfill their commitments.

We have mentioned Regulatory Guide 1.33 in this discussion, despite the inclusion of NQA-1-1979 in Section XI of the Code via the Winter 1982 Addenda, for two reasons. First, Regulatory Guide 1.33, by its endorsement with supplemental provisions of ANS-3.2, provides more specific QA program requirements for operations than does NQA-1 (either version), and should be used in conjunction with Section XI of the Code where the Code does not address all the applicable activities of ANS-3.2, as supplemented by Regulatory Guide 1.33, in sufficient detail. Second, our proposed Revision 3 to Regulatory Guide 1.33 will refer to NQA-1-1983 in lieu of the 1979 version, which is referenced in the most recent version of the ANS-3.2 standard. ANSI/ANS 3.2-1982 refers to NQA-1-1979 for requirements and guidance for a number of activities.

We are currently working with a Section III Task Group to evaluate the regulatory positions of our proposed Revision 3 to Regulatory Guide 1.28, as they pertain to the Code, in order to achieve equivalence of the QA requirements of future Code Addenda and Regulatory Guide 1.28. This activity will hopefully facilitate NRC acceptance of the ASME/NB nuclear accreditation program.

We would appreciate being kept current on the progress of your 10 CFR 50.55a rulemaking. If you need any additional information for your activities, please contact Melinda Malloy (X24532) of the Quality Assurance Branch.



J. Nelson Grace, Director
Division of Quality Assurance,
Safeguards, and Inspection Programs
Office of Inspection and Enforcement

Enclosure: Memorandum for Arlotto from
Taylor dated August 24, 1983

cc: W.F. Anderson, IE
R.J. Bosnak, NRR

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UNITED STATES
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WASHINGTON, D. C. 20555

MAY 13 1985

Mr. James B. MacRae
Office of Management and Budget
Reports Management, Room 3201
New Executive Office Building
Washington, D.C. 20503

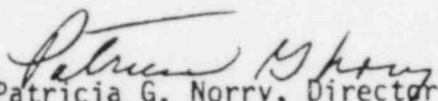
Dear Mr. MacRae:

In accordance with Section 3507 of Public Law 96-511 of December 11, 1980, and regulations of the Office of Management and Budget, I am enclosing for OMB review copies of Standard Form-83 and the Supporting Statement for 10 CFR 50, Domestic Licensing of Production and Utilization Facilities:

The estimated respondent burden is 3517 hours per year.

In accordance with NRC's procedures, my staff has made an independent review of the practical utility and necessity for the proposed information collection and we are in concurrence with this proposal. We have also reviewed for duplication and found no similar requirement in the agency. Therefore, we are transmitting this material for appropriate OMB review and approval.

Sincerely,


Patricia G. Norry, Director
Office of Administration

Enclosures:
As stated

~~Doc 8505200562~~

Request for OMB Review

Important

Read instructions before completing form. Do not use the same SF 83 to request both an Executive Order 12291 review and approval under the Paperwork Reduction Act.

Answer all questions in Part I. If this request is for review under E.O. 12291, complete Part II and sign the regulatory certification. If this request is for approval under the Paperwork Reduction Act and 5 CFR 1320, skip Part II, complete Part III and sign the paperwork certification.

Send three copies of this form, the material to be reviewed, and paperwork—three copies of the supporting statement, to

Office of Information and Regulatory Affairs
Office of Management and Budget
Attention: Docket Library, Room 3201
Washington, DC 20503

PART I.—Complete This Part for All Requests.

1. Department/agency and Bureau/office originating request

U.S. Nuclear Regulatory Commission

2. Agency code

3 1 5 0

3. Name of person who can best answer questions regarding this request

G. C. Millman

Telephone number

(301) 443-7862

4. Title of information collection or rulemaking

10 CFR 50, Domestic Licensing of Production and Utilization Facilities

5. Legal authority for information collection or rule (cite United States Code, Public Law, or Executive Order)

USC or Atomic Energy Act of 1954, as amended

6. Affected public (check all that apply)

1 ☐ Individuals or households

3 ☐ Farms

5 ☐ Federal agencies or employees

2 ☐ State or local governments

4 ☒ Businesses or other for-profit

6 ☐ Non-profit institutions

7 ☐ Small businesses or organizations

PART II.—Complete This Part Only if the Request is for OMB Review Under Executive Order 12291

7. Regulation Identifier Number (RIN)

or, None assigned ☐

8. Type of submission (check one in each category)

Classification

1 ☐ Major

2 ☐ Nonmajor

Stage of development

1 ☐ Proposed or draft

2 ☐ Final or interim final, with prior proposal

3 ☐ Final or interim final, without prior proposal

Type of review requested

1 ☐ Standard

2 ☐ Pending

3 ☐ Emergency

4 ☐ Statutory or judicial deadline

9. CFR section affected

CFR

10. Does this regulation contain reporting or recordkeeping requirements that require OMB approval under the Paperwork Reduction Act and 5 CFR 1320? ☐ Yes

11. If a major rule, is there a regulatory impact analysis attached? ☐ Yes ☐ No

1 ☐ Yes 2

3 ☐ Yes 4

If "No," did OMB waive the analysis?

Certification for Regulatory Submissions

In submitting this request for OMB review, the authorized regulatory contact and the program official certify that the requirements of E.O. 12291 and any applicable policy directives have been complied with.

Signature of program official

Date

Signature of authorized regulatory contact

Date

~~DUPE 8505200565~~

12. (OMB use only)

PART III.—Complete This Part Only if the Request Is for Approval of a Collection of Information Under the Paperwork Reduction Act and 5 CFR 1320.

13. Abstract—Describe needs, uses and affected public in 50 words or less. The NPRM updates existing references to specific sections of the ASME Boiler and Pressure Vessel Code that set forth requirements by which nuclear power plant components are constructed and inspected. These requirements provide that plant owners maintain records of certain safety related activities. The records can be used by NRC to audit the performance of these activities. The recordkeeping applies to the owners of nuclear power plants and does not affect the general public.

14. Type of information collection (check only one)

Information collections not contained in rules

1 ☐ Regular submission

2 ☐ Emergency submission (certification attached)

Information collections contained in rules

3 ☐ Existing regulation (no change proposed)

4 ☒ Notice of proposed rulemaking (NPRM)

5 ☐ Final, NPRM was previously published

6 Final or interim final without prior NPRM

A ☐ Regular submission

B ☐ Emergency submission (certification attached)

7. Enter date of expected or actual Federal Register publication at this stage of rulemaking (month, day, year): May 1985

15. Type of review requested (check only one)

1 ☐ New collection

2 ☒ Revision of a currently approved collection

3 ☐ Extension of the expiration date of a currently approved collection without any change in the substance or in the method of collection

4 ☐ Reinstatement of a previously approved collection for which approval has expired

5 ☐ Existing collection in use without an OMB control number

16. Agency report form number(s) (include standard/optional form number(s))

N/A

22. Purpose of information collection (check as many as apply)

1 ☐ Application for benefits

2 ☐ Program evaluation

3 ☐ General purpose statistics

4 ☒ Regulatory or compliance

5 ☐ Program planning or management

6 ☐ Research

7 ☐ Audit

17. Annual reporting or disclosure burden

1 Number of respondents

2 Number of responses per respondent

3 Total annual responses (line 1 times line 2)

4 Hours per response

5 Total hours (line 3 times line 4)

18. Annual recordkeeping burden

1 Number of recordkeepers

2 Annual hours per recordkeeper

3 Total recordkeeping hours (line 1 times line 2)

4 Recordkeeping retention period years

19. Total annual burden

1 Requested (line 17-5 plus line 18-3)

2 In current OMB inventory

3 Difference (line 1 less line 2)

Explanation of difference

4 Program change

5 Adjustment

23. Frequency of recordkeeping or reporting (check all that apply)

1 ☒ Recordkeeping

Reporting

2 ☒ On occasion

3 ☐ Weekly

4 ☐ Monthly

5 ☐ Quarterly

6 ☐ Semi-annually

7 ☐ Annually

8 ☐ Biennially

9 ☐ Other (describe):

20. Current (most recent) OMB control number or comment number

3150-0011

21. Requested expiration date

6/85

24. Respondents' obligation to comply (check the strongest obligation that applies)

1 ☐ Voluntary

2 ☐ Required to obtain or retain a benefit

3 ☒ Mandatory

25. Are the respondents primarily educational agencies or institutions or is the primary purpose of the collection related to Federal education programs? ☐ Yes ☒ No

26. Does the agency use sampling to select respondents or does the agency recommend or prescribe the use of sampling or statistical analysis by respondents? ☐ Yes ☒ No

27. Regulatory authority for the information collection

10 CFR 50.55a

; or FR

; or, Other (specify):

Paperwork Certification

In submitting this request for OMB approval, the agency head, the senior official or an authorized representative, certifies that the requirements of 5 CFR 1320, the Privacy Act, statistical standards or directives, and any other applicable information policy directives have been complied with.

Signature of program official

Date

Signature of agency head, the senior official or an

authorized representative

Date

Supporting Statement for Information Collection Requirements in
10 CFR §50.55a

1. Justification

a. Need for the Information Collection

NRC Regulations in 10 CFR §50.55a incorporate by reference Section III, Division 1, and Section XI, Division 1, of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code). These sections of the ASME Code set forth the requirements to which nuclear power plant components are designed, constructed, tested and inspected. Inherent in these requirements are certain recordkeeping functions.

Incorporation of the Winter 1982 Addenda, Summer 1983 Addenda, Winter 1983 Addenda, Summer 1984 Addenda, and 1983 Edition for Section III, Division 1, of the ASME Code would add the following recordkeeping requirements.

Section III

- o Winter 1982 Addenda
NB-2125, Fabricated Hubbed Flanges - New provision for surface examination requires documentation of examination results.
- o Summer 1983 Addenda
No additional recordkeeping
- o Winter 1983 Addenda
NCA-3650, Design Documents for Appurtenances - Requires Design Document for each appurtenance that is to be attached to a component unless it is already included in the component Design Documents.
- o Summer 1984 Addenda
NB/NC-7240, Review of (Overpressure Protection) Report After Installation - Addendum to report required to document any modification of the installation from that used for preparation of the Overpressure Protection Report.
ND-7200, Overpressure Protection Report - Requires overpressure protection report for Class 3 components to define the protected systems and the integrated overpressure protection provided, and (ND-7240) documentation of any modification of the installation from that used for preparation of the Overpressure Protection Report.
- o 1983 Edition¹
All requirements, except those for Winter 1982 Addenda, previously incorporated in separate amendments to 10 CFR §50.55a.

¹ The 1983 Edition of Section III is equivalent to the 1980 Edition, as modified by the Summer 1980 Addenda, Winter 1980 Addenda, Summer 1981 Addenda, Winter 1981 Addenda, Summer 1982 Addenda, and the Winter 1982 Addenda.

Incorporation of the Winter 1982 Addenda, Summer 1983 Addenda, and the 1983 Edition of Section XI, Division 1, of the ASME Code would add the following recordkeeping requirements.

Section XI

- o Winter 1982 Addenda
IWA-6220(b), Preparation (of Records and Reports) -- Requires preparation of Owner's Report for Repairs or Replacements (Form NIS-2).
- o Summer 1983 Addenda
No additional recordkeeping
- o 1983 Edition²
All requirements, except those for Winter 1982 Addenda, previously incorporated in separate amendments to 10 CFR §50.55a.

The Winter 1982 Addenda of the ASME Code references ANSI/ASME NQA-1-1979, "Quality Assurance Program Requirements for Nuclear Power Plants." NQA-1-1979 is based upon the contents of ANSI/ASME N45.2-1979, "Quality Assurance Program Requirements for Nuclear Facilities" and seven daughter standards. These standards are referenced in Regulatory Guides 1.28, 1.58, 1.64, 1.74, 1.88, 1.123, 1.144, and 1.146 as providing methods acceptable for implementing certain NRC quality assurance program requirements. NQA-1-1979 incorporates no recordkeeping beyond that originally required by the N45 standards upon which it is based. There is, therefore, no additional recordkeeping burden associated with the endorsement of NQA-1-1979.

b. Practical Utility of the Information Collection

These records are used by the licensees, National Board inspectors, insurance companies, and the NRC in the review of a variety of activities, many of which affect safety. The records are generally historical in nature and provide data on which future activities can be based. NRC Inspection and Enforcement personnel can spot check the records required by the ASME Code to determine, for example, if proper inservice examination test methods were utilized.

c. Duplication With Other Collections of Information

ASME requirements are incorporated to avoid the need for writing equivalent NRC requirements. The final rule will not duplicate the information collection requirements contained in any other generic regulatory requirement.

d. Consultations Outside the NRC

No consultations.

²The 1983 Edition of Section XI is equivalent to the 1980 Edition, as modified by the Winter 1980 Addenda, Winter 1981 Addenda, and the Winter 1982 Addenda.

e. Other Supporting Information

NRC applicants and licensees have been complying with the information collection requirements of the ASME Code since 1971. No problems with these information collection requirements have been identified to the NRC by the applicants or licensees.

2. Description of the Information Collection

a. Number and Type of Respondents

In general, the information collection requirements incurred by §50.55a through endorsement of the Code apply to the owners of the 34 nuclear power plants under construction and to the owners of the 93 nuclear power plants in operation. The actual number of plants that would implement the edition and addenda addressed by the proposed revision, and thereby be affected by their information collection requirements, is dependent on a variety of factors. These factors include whether the application is for Section III or Section XI, the class and type of components involved, the dates of the construction permit and construction permit application, the schedule of the inservice inspection program, and whether the plant voluntarily elects to implement updated editions and addenda of the ASME Code.

b. Reasonableness of the Schedule for Collecting Information

The information is generally not collected, but is retained by the licensee to be made available to the NRC in the event of an NRC inspection or audit.

c. Method of Collecting the Information

See Item 2(b).

d. Adequacy of the Description of the Information

The ASME Code provides listings of information required and specific forms to assist, where necessary, in documenting required information.

e. Record Retention Period

The retention period for information is in accordance with a schedule provided in Table NCA-4134.17-1 of the ASME Code. The retention periods for information keeping requirements specified in Item 1.a above are:

<u>Information</u>	<u>Retention Period</u> ⁽³⁾
Design document for appurtenances	Lifetime
Overpressure protection report	Lifetime
Reports for repair and replacement	Lifetime
Final nondestructive examination report	Lifetime

Lifetime retention of the above records is necessary to ensure adequate historical information on the design and examination of components and systems to provide a basis for evaluating degradation of these components and systems at any time during their service lifetime.

3. Estimate of Burden

a. Estimated Hours

The information collection requirements inherent in incorporating by reference the latest edition and addenda of Section III, Division 1, and Section XI, Division 1, of the ASME Code are identified in Item 1.a above. These requirements may be categorized in terms of Section III requirements that document component/system design and the results of construction examinations, and Section XI requirements that document repairs and replacements.

The additional Section III requirements incur a one-time burden on plants under construction. The information collection requirements associated with the proposed edition and addenda are generation of the design documents for appurtenances and the overpressure protection report. Section 50.55a specifies that the Code Edition, Addenda, and optional Code Cases to be applied to reactor coolant pressure boundary, and Quality Group B and Quality Group C components must be determined by the provisions of paragraph NCA-1140 of Subsection NCA of Section III of the ASME Code. NCA-1140 specifies that the owner (or his designee) shall establish the ASME Code edition and addenda to be included in the Design Specifications, but that in no case shall the Code edition and addenda dates established in the Design Specifications be earlier than three years prior to the date that the nuclear power plant construction permit is docketed. NCA-1140 further states that later ASME Code editions and addenda may be used by mutual consent of the Owner (or his designee) and Certificate Holder. The earliest Section III addenda being addressed in the proposed rule is the Winter 1982 Addenda. Since the last plant to be docketed that is still under construction was docketed in October 1974 (Palo Verde Units 1, 2, 3), there is no plant under construction for which implementation of the Section III edition and addenda specified in the proposed rule is a requirement. Plants may implement these improved rules on a voluntary basis, but unless they make that choice, there is no additional paperwork burden associated with incorporating the proposed Section III edition and addenda.

³ Service lifetime of the component or system.

The additional Section XI requirements incur a burden associated with the documentation of component repairs and replacements. To facilitate this documentation, Section XI provides Form NIS-2, "Owners' Report for Repairs or Replacements." Information required by this form relates to identifying the owner and facility; identifying the components repaired or replaced and replacement components; identifying the type of work, the repair organization and by whom the work was performed; and identifying the type of tests conducted. A portion of this information, such as that to identify the owner, facility and components is already required by Form NIS-1, "Owners' Data Report for Inservice Inspections," (Form NIS-1 was part of an addenda previously incorporated by reference into §50.55a). Most of the remaining information required by Form NIS-2 can be obtained from the previously prepared component work/repair order. It is estimated that the time required to complete the required documentation on Form NIS-2 is ten hours.

Nuclear power plants are required to update their inservice inspection programs by incorporating into their initial 120-month inspection interval requirements of the latest edition and addenda of Section XI, Division 1, that have been incorporated by reference into §50.55a as of 12 months prior to the date of issuance of the operating license; and by incorporating into successive 120-month inspection intervals requirements of the latest edition and addenda of Section XI that have been incorporated by reference as of 12 months prior to the start of a 120-month inspection interval. On this basis, many plants will at one time be required to implement the Section XI, Division 1, edition and addenda specified in the proposed rule. The number of plants that will be implementing the specified edition and addenda will grow gradually as each plant updates its inservice inspection program at the 10-year interval. Therefore, conservatively, the total number of plants that may ultimately be required to implement the specified edition and addenda is 127 (i.e., 93 operating plants and 34 plants under construction).

Inservice inspections are typically performed at the time of refueling (i.e., approximately every 18 months). The need to complete an NIS-2 form would occur as a result of a repair required by the results of an inservice inspection, or as a result of an unanticipated repair between refuelings. It is estimated that 2 NIS-2 forms are completed for repairs resulting from the inspection and 2 for repairs required during operation. Assuming applicability to 127 plants, and the completion of 4 NIS-2 forms by each plant every 18 months, with ten hours required to collect information and complete each form, it is estimated that the total time required by all utilities to complete the NIS-2 form is approximately 3400 hours/year (i.e., $4 \text{ forms} \times 127 \text{ plants} = 508 \text{ forms per 18 months}$, $508 \text{ forms} \times 2 = 1016 \text{ forms per 3 years}$, $1016 \text{ forms} / 3 = 339 \text{ forms per year}$, $339 \text{ forms} \times 10 \text{ hours per form} = 3390 \text{ hours per year}$). The time required to maintain these repair and replacement records for

the period noted in Item 2.e is estimated to be 1 hour/year for each plant. Thus, the total time required by all utilities to complete and maintain the NIS-2 form is approximately 3517 hours/year.

b. Estimated Cost Required to Respond to the Collection

Based upon the hours specified in Item 3.a, it is estimated that the cost of responding to the information collection required by the Section III, Division 1, and Section XI, Division 1, edition and addenda specified in the proposed amendment to §50.55a is a total of \$211,020/year (3517 hrs x \$60/hr) for 127 plants.

c. Source of Burden Data and Method for Estimating Burden

Estimates of the number of NIS-2 forms that are completed during a year and the time required to collect the necessary information and to complete the forms, were obtained from utility staff inservice inspection specialists and NRC staff in the Office of Inspection and Enforcement (regional and headquarters) engaged in inservice inspection activities.

d. Reasonableness of Burden Estimate

The estimate of the burden is considered reasonable because of the reliable source of the burden data.

4. Estimate of Cost to the Federal Government

NRC inspection personnel who audit plant quality assurance records would include in their audit verification of the proper implementation of the NIS-2 form. The time associated with NRC inspectors verifying use of the NIS-2 form would be extremely small when the activity is performed as part of a normal quality assurance audit.

WB2

FORM NIS-2 OWNER'S REPORT FOR REPAIRS OR REPLACEMENTS
As Required by the Provisions of the ASME Code Section XI

1. Owner _____
Name _____
Address _____
Date _____
Sheet _____ of _____
2. Plant _____
Name _____
Address _____
Unit _____
Repair Organization P.O. No., Job No., etc. _____
3. Work Performed by _____
Name _____
Address _____
Type Code Symbol Stamp _____
Authorization No. _____
Expiration Date _____
4. Identification of System _____
5. (a) Applicable Construction Code _____ 19 _____ Edition, _____ Addenda, _____ Code Case
(b) Applicable Edition of Section XI Utilized for Repairs or Replacements 19 _____
6. Identification of Components Removed or Replaced and Replacement Components

Name of Component	Name of Manufacturer	Manufacturer's Serial No.	National Board No.	Other Identification	Year Built	Repaired, Replaced, or Replacement	ASME Code Stamped (Yes or No)

7. Description of Work _____

8. Tests Conducted: Hydrostatic ☐ Pneumatic ☐ Nominal Operating Pressure ☐
Other ☐ Pressure _____ psi Test Temp. _____ °F

NOTE: Supplemental sheets in form of lists, sketches, or drawings may be used, provided (1) size is 8½ in. x 11 in., (2) information in Items 1 through 6 on this report is included on each sheet, and (3) each sheet is numbered and the number of sheets is recorded at the top of this form.

(12/82)

This Form (E00030) may be obtained from the Order Dept., ASME, 345 E. 47th St., New York, N.Y. 10017

WB2

FORM NIS-2 (Back)

9. Remarks _____

Applicable Manufacturer's Data Reports to be attached

CERTIFICATE OF COMPLIANCE	
We certify that the statements made in the report are correct and this _____ conforms to the rules of the ASME Code, Section XI. repair or replacement	
Type Code Symbol Stamp _____	
Certificate of Authorization No. _____	Expiration Date _____
Signed _____ Owner or Designated Person	Date _____, 19____

CERTIFICATE OF INSERVICE INSPECTION	
I, the undersigned, holding a valid commission issued by the National Board of Boiler and Pressure Vessel Inspectors and the State or Province of _____, do hereby certify that _____ of _____ have inspected the components described in this Owner's Report during the period _____ to _____, and state that to the best of my knowledge and belief, the Owner has performed examinations and taken corrective measures described in this Owner's Report in accordance with the requirements of the ASME Code, Section XI.	
By signing this certificate neither the Inspector nor his employer make any warranty, expressed or implied, concerning the examinations and corrective measures described in this Owner's Report. Furthermore, neither the Inspector nor his employer shall be liable in any manner for any personal injury or property damage or a loss of profit arising from or connected with this inspection.	
Inspector's Signature _____	Commissions _____ National Board, State, Province, and Endorsements
Date _____, 19____	

(12/82)