



# ICC CODES - PUBLIC COMMENT FORM

FOR PUBLIC COMMENTS ON THE "2009/2010 REPORT OF THE PUBLIC HEARINGS"

- IBC - International Building Code (E, FS, G, S)
- IEBC-International Existing Building Code (EB)
- IFC-International Fire Code (F)
- IFGC - International Fuel Gas Code (FG)
- IMC - International Mechanical Code (M)
- IPC - International Plumbing Code (P)
- IRC - International Residential Code-Building (RB)
- IRC-International Residential Code-Plumbing/Mechanical (RP, RM)
- IWUIC- International Wildland-Urban Interface Code (IWUIC)

**CLOSING DATE: All Comments Must Be Received by February 8, 2010.** The 2009/2010 Final Action Hearings for the codes listed above, will be held May 14-23, 2010 in Dallas, TX.

1) Please type or print clearly: Public comments will be returned if they contain unreadable information.

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2) Copyright Release: In accordance with Council Policy #28 Code Development, all Code Change Proposals, Floor Modifications and Public Comments are required to include a copyright release. A copy of the copyright release form is included at the end of this form. Please follow the directions on the form. This form as well as an alternative release form can also be downloaded from the ICC website at [www.iccsafe.org](http://www.iccsafe.org). If you have previously executed the copyright release, please check the box below:

2009/2010 Cycle copyright release on file

3) Code Change Proposal Number:

Indicate the Code Change Proposal Number that is being addressed by this Public Comment: S121-09/10

4) Public Comment: The Final Action requested on this Code Change Proposal is: (Check Box)

Approved as Submitted (AS):
  Approved as Modified by this Public Comment (AMPC):
  Approved as Modified by the Code Committee as Published in the ROH (AM):
  Approved as Modified by Assembly Floor Action as Published in the ROH (AMF):
  Disapproved (D):

Attached Proposed Modifications and/or Reason Statements:

See Attached Individual Consideration Form

PLEASE USE SEPARATE FORM FOR EACH PUBLIC COMMENT  
 SUBMITTAL AS A DOCUMENT ATTACHED TO AN EMAIL IS PREFERRED  
 SEE BACK OF FORM FOR DIRECTIONS ON WHERE TO SEND PUBLIC COMMENTS

# INDIVIDUAL CONSIDERATION FORM

## **S121-09/10**

**1704.3-1704.3.3.3, Table 1704.3**

### **Individual Consideration Agenda**

**This item is on the agenda for individual consideration because a public comment was submitted.**

*Public Comment:*

**Homer Maiel, PE, CBO, City of San Jose, representing ICC Tri-Chapter (Peninsula, East Bay, Monterey Chapters), requests Disapproval.**

**Commenter Reason:**

As approved at the Code Development Hearing, S121-09/10 permits a significant reduction of the frequency and thoroughness of inspections that must be conducted for multi-pass welds by the special inspector. This reduction was not disclosed in the proponent's reason statement nor was it discussed by the IBC Structural Committee that voted to approve the proposal.

Continuous special inspection has been required by Table 1704.3 since the inception of the IBC for complete and partial penetration groove welds, multipass fillet welds, and single pass fillet welds greater than 5/16". Plug and slot welds were added to that list in the 2009 edition.

Proposal S121-09/10 removes most of Table 1704.3 and replaces that information by referencing the quality assurance (QA) provisions of the new Chapter N in AISC 360-10.

Chapter N of AISC 360-10 does not use the traditional code terminology of "continuous" or "periodic" to describe the frequency of welding inspection. Rather, the terms Observe (O), and Perform (P) are applied to the welding inspection tasks identified in three separate tables that address the inspection tasks to be performed Before, During, and After welding.

Observe and Perform are defined in AISC 360-10, Section N5.4 Inspection of Welding as follows:

O – Observe these items on a random basis. Operations need not be delayed pending these inspections.

P – Perform these tasks for each welded joint or member.

The Observe level of inspection is applied to all of the "Before" and "During" welding inspection tasks, with the exception of verifying that welding procedure specifications (WPSs) are available, and that manufacturer certifications for welding consumables are available. Inspection tasks such as verifying fit-up of groove welds and fillet welds (before welding), and verifying that the WPS is followed and that interpass cleaning and quality (during welding) are adequate, would thus only be performed on a "random basis". AISC 360 Commentary indicates that the inspector would not need to be on site when welding is performed, provided he or she has verified the materials, processes, and the welder's skill level. This is clearly very different than current IBC requirements that specify continuous inspection yet the reason statement provided for S121 did not acknowledge this significant change nor did it provide any insight into why such a reduction might be warranted.

The Tri-Chapter requests that the approval given to S121-09/10 be rescinded so that welding special inspection is not reduced, until such time that this reduction can be fully justified and be openly discussed by the members of ICC that enforce the current provisions of the code.

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