



Secretariat

INTERNATIONAL ELECTROTECHNICAL COMMISSION (IEC) SYSTEM FOR CERTIFICATION TO STANDARDS RELATING TO EQUIPMENT FOR USE IN EXPLOSIVE ATMOSPHERES (IECEx SYSTEM)

Circulated to: ExMC

Title: US Proposal - agenda item 13.3, Technical Capability Documents

Introduction

The attached proposal from the USNC/IECEx contains additional information from US regarding document ExMC/1039/DV.

This proposal is presented for discussion and consideration during the 2015 ExMC Christchurch meeting.

Members are requested to consider the proposal ahead of the ExMC meeting.

IECEx Secretariat

Address:
Level 33, Australia Square
264 George Street
Sydney NSW 2000
Australia

Contact Details:
Tel: +61 2 46 28 4690
Fax: +61 2 46 27 5285
e-mail: info@iecex.com
<http://www.iecex.com>



Chairman: E. Massey
Vice Chairman: P. Kelly
Past Chairman: J. Olson
Treasurer: D. El Tawy

USNC/IECEX
c/o NEMA
1300 North 17th St., Ste. 900
Rosslyn, VA 22209

August 11, 2015

VIA E-MAIL TRANSMISSION

Mr. Chris Agius
Secretary IECEx
Level 33 Australia Square
264 George Street
Sydney NSW 2000
Australia

Subject: Agenda Item 13.3, *ExMC WG2 – Development of Technical Guidance Documents (ExMC/1039/DV)*

Dear Mr. Agius:

The USNC/IECEX thanks ExMCWG2, *Technical Capability Documents*, for their work at attempting to resolve this issue regarding minimum test equipment that an ExTL must maintain in house. Recognizing ExMC/1049/CD, proposed from the US for a list of minimum equipment, requested action on this issue; however, we are not in favor of the proposed action sought by ExMC/1039/DV, *Technical Capability Document (TCD)*, for the following reason:

The USNC/IECEX is of the opinion that the ExCBs/ExTLs shall have clearly documented procedures on how to address all assessments and tests under their scope. This shall address activities that may be accomplished in-house, witnessed, subcontracted, or some combination thereof.

The IECEx System needs to manage when and how an ExTL is permitted to witness or subcontract a given test, but still be accredited to offer the testing service. Such permission requires the following:

- a clear indication of what minimum testing, if any, an ExTL is able to perform in their facility;
- what testing they can witness or subcontract outside their facility;
- how assessors are to assess their knowledge of a test that they do not perform in their facility; and
- how the ExTL is to control the witnessing/subcontracting activity.

The issue of how assessors are to assess an ExTL's knowledge regarding a test that the ExTL do not perform in their facility is arguably the most important aspect of this overall issue. Therefore, this needs to be carefully documented by both the ExTL and the IECEX assessor and controlled on an on-going basis.

Please contact me if you have any questions related to these comments.

Respectfully,

Joel Solis, Secretary
USNC/IECEX