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INTERPRETATION

Start of Construction Prior to Confirmation of Design Registration

Introduction

Safety Codes Act section 40(2): *If this Act requires that the design of any thing, process or activity be registered, no person shall construct or manufacture the thing or undertake or operate the process or activity unless the design is registered.*

Pressure Equipment Safety Regulation section 14(1):

No person shall

(a) construct or manufacture for use in Alberta, or

(b) import for use in Alberta

any pressure equipment unless the design of that pressure equipment is registered by the Administrator pursuant to section 40 of the Act and the design of the pressure equipment meets the requirements of this Regulation.

CSA B51 is adopted under the Pressure Equipment Safety Regulation section 6(a)

CSA B51 clause 4.1.1 regarding registration of designs states in part:

...Acceptance and registration shall be obtained before construction begins.

Manufacturers who commence construction prior to receiving design registration shall rectify any design deficiencies that are identified in the design registration process.

INTERPRETATION

Alberta legislation does not prohibit construction of pressure equipment to be started prior to receipt of confirmation of design registration.

If the manufacturer decides to begin construction or manufacture of pressure equipment prior to receiving confirmation of the design registration, the manufacturer must rectify any deficiencies found during the design registration process. The confirmation of design registration and all construction and manufacturing activities must be completed before the Manufacturer's Data Report is certified.

Background

A common industry practice is to commence construction of pressure equipment prior to receiving the design registration. It is understood that this is to meet the demands of scheduling and shipping of the pressure equipment and there is no safety concern with starting construction. However, there may be manufacturing inefficiency if design deficiencies are found during the design registration process and rework is required to correct the deficiency.

ABSA reviews designs as part of the registration process. Design reviews have identified deficiencies that required design revision. The manufacturer should carefully review the pressure equipment design, and should ensure the design complies with the Act, regulations and code of construction, prior to submitting the design for registration. The purchaser should ensure that the purchase documents stipulate that confirmation of design registration is required before the Manufacturer's Data Report is certified.

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