



SAFETY ASSESSMENT
FEDERATION

Guidance

In-service Inspection Procedures

Preparation of plant for the purposes of Inspection.

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1. Situation

BS EN ISO/IEC 17020 – Conformity assessment requirements for the operation of various types of bodies performing inspection includes in Annex A, independence requirements for Type A, Type B and Type C Inspection Bodies.

BS EN ISO/IEC 17020 states:

Impartiality and Independency

The inspection body shall be responsible for the impartiality of its inspection activities and shall not allow commercial, financial, or other pressures to compromise impartiality.

The inspection body shall be independent to the extent that is required with regard to the conditions under which it performs its services.

Type C Inspection Bodies

The design/manufacture/supply/installation/servicing/maintenance and the inspection of the same item carried out by a Type C inspection body shall not be undertaken by the same person.

Provision and Use of Work Equipment Regulations (PUWER) differentiates between maintenance and inspection as follows:

Maintenance of plant and equipment is carried out to prevent problems arising, to put faults right, and to ensure equipment is working effectively.

The purpose of an inspection is to identify whether the equipment can be operated, adjusted, and maintained safely and that any deterioration (for example defect, damage, wear) can be detected and remedied before it results in unacceptable risks. An inspection will vary from a simple visual external inspection to a detailed comprehensive inspection, which may include some dismantling and/or testing.

This guidance document looks to distinguish between maintenance and inspection.

2. Guidance

Where the preparation and/or access to the inspected item does not require the Inspection Body to fit spare, or replacement parts, this is NOT considered a maintenance activity. Where it is expected the preparation will routinely require new or replacement parts, this would be considered a maintenance activity.

To facilitate access to carry out the examination, simple hand may be required. To facilitate refitting of panels/access covers removed during this process, items such as single use 'crush washers'/seals may require replacement to enable a panels/access covers to be refitted. This is not considered maintenance. Renewal of parts/panels/access covers would be considered maintenance.

3. Examples

3.1. Example 1: Gearbox top cover removed/refitted for access.

Not considered a maintenance activity, as its purpose is merely to gain access to ascertain condition of the lubricating oil/gear facings at time of the Thorough Examination.

3.2. Example 2: Air Receiver inspection plug/bung removal/refitment for access.

Not considered a maintenance activity, as its purpose is to gain access to ascertain the internal condition of the air receiver at time of the Examination.

3.3. Example 3: Vehicle Lifting Table removal/refit of access panels.

Not considered a maintenance activity, as its purpose is merely to gain access to ascertain condition of/take measurements of wear at the time of the Thorough Examination.

3.4. Example 4: Platform Lift removal/refit of access panels.

Not considered a maintenance activity, as its purpose is merely to gain access to ascertain condition of/take measurements of wear at the time of the Thorough Examination.

3.5. Example 5: Electrical ATEX Sealed Panel Access

Not considered a maintenance activity, as its purpose is to gain access to ascertain the internal condition of wiring at time of the Examination.