



ExMC/1760/CD
August 2021

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

Circulated to: IECEX Management Committee (ExMC)

**Title: US Comments relating to 2021 ExMC Meeting Agenda Item 10.2 ExSFC
Reporting and proposed revision of OD 314-5, ExMC/1715/DV**

This document contains comments from the US Member Body concerning Agenda item 10.2 ExSFC Reporting and proposed revision of IECEX OD 314-5 (ExMC/1715/DV) 2021 ExMC Meeting Agenda (ExMC/1729B/DA) and are to be considered during the 2021 ExMC Meeting.

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

Contact Details:
Tel: +61 2 4628 4690
Fax: +61 2 4627 5285
e-mail: info@iecex.com
<http://www.iecex.com>

August 11, 2021

VIA E-MAIL TRANSMISSION

Mr. Chris Agius
IECEX Secretariat
c/o IEC Central Office
3, rue de Varembe
P.O. BOX 131
CH-1211 Geneva 20, Switzerland

Subject: USNC/IECEX Comment Regarding the Agenda for the 2021 ExMC Meeting, Item 10.2, ExMC/1715/DV

Dear Mr. Agius:

The USNC/IECEX would like to thank the work of ExSFC WG 04 on their proposed revisions to OD 314-5, Edition 1.2, as shown in ExMC/1715/DV.

We request that the following revisions be made OD 314-5:

- **3.5.3, Internal Audit** – Remove addition of 18 month allowance for internal audits for service facilities. The 18 month surveillance requirement applies to ExCBs auditing the service facility that meet the requirements detailed in Clause 9.6 of IECEX 03-5. It was not the intention to apply the 18 month requirement to the internal audits performed by service facilities and this was agreed upon in previous meetings. See proposed text below for suggested revision:

“The audit program shall address the effectiveness of the elements of the QMS as described in this document to ensure that the repair, overhaul and reclamation processes are in conformity with IEC 60079-19, Clause 4.3.2.1 h) and information provided by IECEX OD 315-5. The period between audits should normally not exceed 12 months. ~~(or 18 months as permitted by Clause 9.6 of IECEX 03-5).~~”

- **3.5.8, Improvement** – The ISO 9001:2015 reference of 8.5.1 should be replaced with 10.1. Clause 8.5.1 in ISO 9001:2015 covers “Control of production and service provision”, while clause 10.1 covers “Improvement”. This will align with the clause reference in OD 314-4. Additionally, a reference to 10.3 in ISO 9001:2015 should be included which covers “Continual improvement”. See proposed text below for suggested revision:

“Clause ~~10.3~~ 10.1 and 10.38-5.4 of ISO 9001:2015 applies.”

- **3.5.9, Corrective and preventive action** – The ISO 9001:2015 reference of 10.3 should be replaced with 10.2. Clause 10.3 in ISO 9001:2015 covers “Continual improvement”, while clause 10.2 covers “Nonconformity and corrective action”. This will align with the clause reference in OD 314-4. Also, “preventive” should be removed from the title of 3.5.9 and the title should read “Corrective action”. This aligns with ISO 9001:2015 as well as OD 314-4. See proposed text below for suggested revision:

“3.5.9 Corrective ~~and preventive~~ action

Clauses 10.1 and 10.2~~3~~ of ISO 9001:2015 apply.”

- **4, Preliminary requirements for ExCB assessment of Ex repair facilities** – The title should be changed from “Preliminary requirements for ExCB assessment of Ex repair facilities” to “Preliminary requirements for ExCB assessment of Service Facility”. “Repair facility” is not defined in this document. All other references to “repair facility” were previously replaced with “service facility” in this document. See proposed text below for suggested revision:

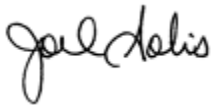
“**4 Preliminary requirements for ExCB assessment of ~~ServiceEx repair~~
Facilities”**

- **8, Records** – Clause reference “4.3.2.4.3 g)” in last bullet point should be replaced with “4.3.2.4.3”. All records detailed in 4.3.2.4.3 of IEC 60079-19:2019 are to be retained for the period of 10 years and not just the items in 4.3.2.4.3 g). See proposed text below for suggested revision:

“The Ex Service Facility shall retain all repair, overhaul and reclamation records for a minimum of 10 years from the date the repaired product was released (see IEC 60079-19, Clause 4.3.2.4.3-~~g~~)”

Thank you for your attention to this matter. Please contact me if you have any questions.

Sincerely,



Secretary, USNC/IECEX