

CRCPD's Committee on Industrial Radiography (G-34)

Conference of Radiation Control Program Directors, Inc.

A Partnership Dedicated to Radiation Protection

August 18, 2003

E. R. McCabe, Director
Canadian Nuclear Safety Commission
Directorate of Nuclear Substance Regulation
Nuclear Substances and Radiation Devices Licensing Division
P. O. Box 1046, Station B
Ottawa, Ontario
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Dear Mr. McCabe:

The Conference of Radiation Control Program Director's G-34 Committee on Industrial Radiography has been working on a special National Materials Program (NMP) pilot project these past few months, and we're at a point where we would like your help.

The NMP Charter for this pilot project envisions us as the lead organization for the oversight of all activities associated with a national industrial radiographer certification program in the United States. This translates into being responsible for the review and approval of state government and independent organizations' initial applications for approval as recognized certifying entities and subsequent program changes. It also includes follow up evaluations of the programs, and their test administration and program maintenance activities. Potentially, this oversight group could be responsible for reviewing requests from countries, such as Canada, to have their industrial certification programs reciprocally recognized in the U.S.

Our approach to preparing for this responsibility is two fold. Our initial focus has been to formalize the criteria and process for reviewing and approving requests to be recognized as certifying entities. We envision being able to apply criteria that is based on our nationally-accepted standards that are found in 10 Code of Federal Regulations, Part 34, Appendix A for radioactive materials programs, and the equivalent CRCPD document, SSRCR Part E, for x-ray only and combination certifications. A copy of the draft criteria is included for your review. We've also mapped the events associated with previous certification reviews and have provided you a visual of the process in the accompanying flowcharts.

**Office of the Committee Chairperson
Jan Endahl**

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Step two of our project is to actually apply the criteria and process in a test case that involves a new application for certification, or reviews the process of a previous application that was evaluated, or applies the criteria and process to the certification program of an existing state certifying entity

This is where you come in. During previous communications with staff at the U.S. Nuclear Regulatory Commission, Canadian program staff have inquired about the feasibility of reaching an agreement that would reciprocally recognize U. S. and Canadian operators of gamma radiography devices. To accomplish that, the Canadian program would essentially have to go through an application process similar to what is required of independent certifying organizations such as the American Society for Nondestructive Testing, Inc. One of the first steps would be a review of the Canadian radiography rules to see that they are comparable to existing accepted U.S. radiography rules. The rule review is one of the first activities in the flowchart process.

You have a unique opportunity to be a ground-floor participant and play a major role in expanding the scope of this project to include an international component, and fine tuning this application and review process. A coordinated, methodical approach to recognizing qualified programs will help to improve radiation safety practices and ensure the consistency of program elements from state to state, as well as across national borders.

By volunteering the Canadian program to be reviewed by our working group, please be advised that your program is NOT actually being evaluated or reviewed for the purpose of reciprocally recognizing Canadian radiographers. Our working group is evaluating the criteria and the process that we have defined to see if the application language and requirements are appropriate and easily understood by a potential applicant. We want

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to make sure that there is sufficient information to enable you, the "applicant," to supply the requested information.

Feedback we receive from you on adapting or modifying the criteria and process to accommodate international considerations would be important for us to receive. You would have the opportunity to take any potential feedback received from the working group for use in future conversations regarding the potential reciprocal recognition of the Canadian certification program in the U.S.

So what do we need from you? We would like for you to either volunteer to be our test case and "go through the application process" with us in order for us to fine tune our

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product, or, at minimum, send us your thoughts, reactions, questions, and comments on the criteria and flowcharts. We anticipate that this will be a fairly short-term commitment of staff resources from all organizations associated with the Canadian certification program. We would like to know your level of involvement by Monday, September 8. You may call me at 512/834-6688 ext. 2229 or email me at: Jan.Endahl@tdh.state.tx.us.

Based on the responses we get from other potential volunteers, the working group will choose its volunteer and notify everyone on September 12 of its decision. If the Canadian program is selected as the test case, we ask that you send one copy of your response packet to me by October 17. I will coordinate copying and distributing the packet to the other working group members. We will use the month of November for dialogue with the "volunteer applicant" to clarify any issues not already addressed in the response. We have committed to completing our review and evaluation of the process by December 1, so that we can begin writing our report.

If you indicate that the Canadian program is not available to be the test case, or if it is not selected to be part of the test case, we are still interested in receiving your comments on the draft criteria and flowcharts by October 1.

We very much appreciate your consideration of our request for assistance with this project, and look forward to receiving your response by September 8 of your level of involvement. Please contact me if you have questions or need additional information.

Sincerely,

Office of the Committee Chairperson

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Jan Endahl, Chair

G-34 Committee on Industrial Radiography

Enclosures: draft criteria
draft flowcharts

c: Mr. David Cochrane

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