

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

Conference of Radiation Control Program Directors, Inc.

A Partnership Dedicated to Radiation Protection

August 18, 2003

Jim Houf
Technical Services Manager
American Society for Nondestructive Testing, Inc.
P. O. Box 28518
Columbus, OH 43228-0518

Dear Mr. Houf:

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. 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.

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 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.

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

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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. ASNT has already gone through formal reviews by an NRC Working Group for its radioactive materials program and by the G-34 Committee for its x-ray and combination certification programs. As stated above, a review of a previous application that was evaluated is a test case option that was named in our Charter. If ASNT were to become our test case, the working group would take the information already submitted and review the materials against the revised criteria. Our goal is to ensure that the application language and requirements are appropriate and easily understood by the applicant. We want to make sure that there is sufficient information to enable applicants to supply the requested information.

You have a unique opportunity to be a ground-floor participant and play a major role in 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. You will have the opportunity to take any potential feedback received from the working group and use it to improve the organization or the efficiency of your program – knowing that at some future point, portions of this criteria may be used to formally evaluate certification programs.

We anticipate that this will be a fairly short-term commitment of staff resources involving those who have been working to develop your program. Not only will your participation have a very positive affect on the outcome of this NMP pilot project, but it will also demonstrate the continued partnership that exists between the industrial radiography industry and the regulatory agencies.

So what do we need from you? We would like for you to either volunteer to be our test case and go through the review of your previous application processes in order for us to

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fine tune our products, or, at minimum send us your thoughts, reactions, questions, and comments on the criteria and flowcharts. 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 a revisit of ASNT's previous applications is selected as the test case, we would like to complete our review by October 31. We will use the month of November for additional dialogue with ASNT to clarify any issues previously not addressed or resolved.

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If ASNT 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 have committed to completing our review and evaluation of the process and consideration of all comments submitted by December 1, so that we can begin writing our report.

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

Sincerely,

Jan Endahl, Chair
G-34 Committee on Industrial Radiography

Enclosures: draft criteria
draft flowcharts

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