

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

Conference of Radiation Control Program Directors, Inc.

A Partnership Dedicated to Radiation Protection

August 18, 2003

Ed Bailey, P.E., CHP, Chief
California Radiologic Health Branch
P. O. Box 942732, MS-178
Sacramento, CA 94234-7320

Dear Mr. Bailey:

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 application that was evaluated, or applies the criteria and process to the certification program of an existing state certifying entity.

Office of the Committee Chairperson

Jan Endahl

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This is where you come in. Staff in your state have indicated they are in the process of putting together the various components for an industrial radiographer certification program. Currently 10 states have programs that are nationally recognized. These states did not undergo a formal, organizational review in becoming recognized. In the future, however, states desiring recognition will most likely be required to go through an application process similar to what is required of independent certifying organizations such as the American Society for Nondestructive Testing, Inc. 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.

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 you, a potential applicant. We want to make sure that there is sufficient information to enable you to supply the requested information. You will have the opportunity to take any potential feedback received from the working group and use it to help develop and organize your new 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 provide evidence of the willingness of states to step up and assume increased responsibilities in the regulatory arenas where they have the expertise.

So what do we need from you? Although your state is not yet ready to go through the application process, we would still like for you to send us your thoughts, reactions,

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questions, and comments on the criteria and flowcharts. We would like to receive this feedback from you 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.

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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 that we can count on you to provide us with your comments. Please contact me if you have questions or need additional information. You may call me at 512/834-6688 ext. 2229, or email me at: Jan.Endahl@tdh.state.tx.us.

Sincerely,

Jan Endahl, Chair
G-34 Committee on Industrial Radiography

Enclosures: draft criteria
draft flowchart

c: Mr. Phillip Scott

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