

The following email was forwarded to Luis A. Martinez, P.E., President of Professional NDE & Welding Services, License No. 52-25538-01, Docket No. 03035477, with the attached response from ASNT early in July 2005. Mr. Martinez responded with letters dated July 5, 2005 (ML052280436, translation ML052310598) and July 12, 2005 (ML052280414, translation ML052280438).

**From:** J. Bruce Carrico  
**To:** Hector Bermudez  
**Date:** 6/30/05 8:11AM  
**Subject:** Re: Fwd: FW: HellierNDT.com contact request from: Luis Martinez

Attached is a response from ASNT explaining why they decided to discontinue the Spanish language version of its examination. After reviewing their response with my section and branch chiefs, we agree we understand ASNT's position and don't anticipate any further action on NRC's part. I understand that its also the State certifiers practice to allow use of a English-Spanish dictionary.

**CC:** Tim Harris  
**From:** "Jim Houf" <Jhouf@asnt.org>  
**To:** "J. Bruce Carrico" <JBC@nrc.gov>  
**Date:** 6/22/05 4:23PM  
**Subject:** RE: IRRSP Exams

Bruce:

No. ASNT did offer an IRRSP exam in Spanish but has discontinued doing so for the following reasons:

1) Research has shown that neither 10CFR34 nor the Suggested State Regulations for Control of Radiation (SSRCR) Part E are officially published in Spanish. (I reconfirmed with the GPO this morning that they only publish documents in the English language.) As a result, it is entirely possible that applicants that cannot take and pass a radiation safety exam in English may also not be able to read and understand the regulations governing them and that seems to indicate a potentially major safety concern.

2) The existing Spanish examination was used for both initial examinations and for retests, and as with all examination materials, the longer an exam is in use the greater the chance that some of the content may have been compromised. Therefore good psychometric practice requires that any test iteration must eventually be retired or revised as it can no longer be considered a reliable test. Because ASNT has no Spanish-speaking personnel in our certification group, there is no way that staff can make changes to the content of this exam to correct this problem.

3) In order to properly validate the translation of an examination, ASNT procedures require that we have the exam translated into Spanish and then have the Spanish version translated back into English in order to verify that the content was not altered during the translation. This required ASNT to have to retain the services of two independent qualified outside contractors, one for each translation, since the translators must not only be fluent in both languages but must be cognizant of the technical terminology used in radiation safety subject materials. This poses an unacceptable financial burden unless there is sufficient market to recover the development costs, and based on the statistics resulting from the administration of the original Spanish examination over the last 4-1/2 years, the market does not justify another translation. Here are the statistics for the first Spanish exam based on the records in our certification database:

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22 exams were given in Puerto Rico, 13 initial (first time) exams and 9 retakes. Of these 22 exams, only 4 people passed and had certificates issued. No exams have been requested or given in the Virgin Islands and of the 8 certificate holders shown as currently living in the Virgin Islands, all have allowed their certificates to expire without recertifying.

I would also like to point out that all of the 12 certificate holders mentioned above may not have taken the Spanish exam, some may have taken it in English. Our database lists the exams and results but is not set up to record the language in which the exam was given. Since no exams were given in the Virgin Islands, all 8 of those cert holders may have taken the exams in English.

As these numbers show, there is not a sufficient market to justify developing another Spanish exam and it would be a financial hardship on ASNT to be required to develop such an exam for such a limited number of people. Furthermore, I am not aware of any of the States that offer radiation safety exams giving them in other languages, and it would not be fair to ASNT to place a restriction on us that is not required uniformly among the other certification bodies.

The fact that ASNT no longer offers a Spanish exam should not be seen as discriminatory as we are more than willing to provide the same examinations to applicants from Puerto Rico and the Virgin Islands as are provided to anyone else that wishes to acquire IRRSP radiation safety certification.

Finally, I would like to point out that of the 4 current Puerto Rican certificate holders, the 3 people that are due for recertification later this year are all from the same company, and when they initially certified using the Spanish exam, their boss also asked to have a copy of the exam available in English "in case the translation was inaccurate". If their English is good enough to use an English version to check the Spanish one, my contention is that their English should also be good enough to take the English exam.

If you have any additional questions regarding this matter, feel free to contact me.

Regards,

Jim Houf, Senior Manager  
ASNT Technical Services Dept.

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-----Original Message-----

From: J. Bruce Carrico [mailto:JBC@nrc.gov]

Sent: Wednesday, June 22, 2005 9:07 AM

To: Jim Houf

Subject: IRRSP Exams

Hi Jim,

A number of years ago, NRC agreed with ASNT translating its IRRSP exam into Spanish and limiting the certification, as I remember, to be valid only in Puerto Rico and the Virgin Islands. Is this still current? Does ASNT still offer Spanish language exam?

**CC:** "Wayne Holliday" <wholliday@asnt.org>

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