



# Conference of Radiation Control Program Directors, Inc.

Office of Executive Director 6 205 Capital Avenue 6 Frankfort, KY 40601

Phone: 502/227-4543 6 Fax: 502/227-7862 6 Web Site: [www.crcpd.org](http://www.crcpd.org)

Central E-mail: [staff@crcpd.org](mailto:staff@crcpd.org)

06 AUG 21 PM 12:02

STP

August 9, 2006

Janet R. Schlueter, Director  
OSTP  
Mail Stop C 310  
US NRC  
Washington, DC 20555

## Board of Directors

**Chairperson**  
Pearce O'Kelley  
<okelletp@  
dhec.sc.gov>  
South Carolina

**Chairperson-Elect**  
Debbie Gilley  
Florida

**Past Chairperson**  
Debra McBaugh  
Washington

**Treasurer**  
John P. Winston  
Pennsylvania

**Members-at-Large**  
Thomas Cardwell  
Texas

Jay C. Hyland  
Maine

James L. McNees  
Alabama

**Office of  
Executive Director**  
Kentucky

**Interim  
Executive Director**  
Charles M. Hardin  
Tele: Ext. 2222  
<[chardin@crcpd.org](mailto:chardin@crcpd.org)>

This letter is in response to a request by Nuclear Regulatory Commission (NRC) staff during the June 28, 2006, National Materials Program (NMP) conference call for an official response from the board of the Conference of Radiation Control Program Directors, Inc. (CRCPD) on the NRC's proposed process for approval and review of radiography certification programs. The Board does not agree with the proposed process and believes that the same process that is used to recognize organizations that certify medical professionals be followed.

The NRC proposal was a result of a March 14, 2006, meeting in Rockville, MD, which was convened to discuss the implementation of NMP Pilot Project 2 work products. The meeting was attended by NRC, OAS and CRCPD representatives

The CRCPD has worked with the NRC on the NMP Pilot Project 2 to develop a national program to facilitate radiographer certification, and streamline processes for a more efficient and effective regulation of the radiography industry. The G-34 Committee was selected to lead this project, as NRC recognized that the expertise for radiation safety in industrial radiography lies within the state radiation control programs. The process for the national recognition of entities, be they States or associations, to be industrial radiographer certifiers was addressed by the G-34 Committee in one of its report recommendations. The structure of the initial approval process, including development of review criteria, would include an NRC staff member on the committee. Any initial approval of an entity requesting to become a certifier of radiographers would be a consensus decision of the committee. Although the development of the subsequent evaluation of the certification programs was beyond the scope of work during the Pilot Project, the working group envisioned that periodic reviews of certification programs could be conducted by the same oversight committee, and would include NRC representation.

This process, excluding periodic reviews, has been informally in place and working for approximately 20 years. Eight States currently work through a cooperative contract with CRCPD to receive industrial radiographer certification exams for their State certification programs. Once the requesting states' regulations and procedures are reviewed and approved to ensure that program components fall within the range of acceptable criteria that were established by state, federal and industry representatives, a contract is executed to allow the states to receive and administer the certification exams. In addition, the G-34 Committee received and processed the request from the American Society for Nondestructive Testing, Inc. (ASNT) to have two of its certification programs reviewed and nationally recognized.

A Partnership Dedicated to Radiation Protection

SURSI Review Complete

STP-006 Imple  
RIDS: SPDL

The G-34 Committee completed its scope of work in developing a national certification program during the NMP Pilot Project 2, and then learned that NRC staff were of the opinion that NRC must be the final authority in the approval and acknowledgment process. NRC indicated that its approval would occur during an IMPEP process, not during the initial review of a state's certification program. The need for NRC to have either final approval or approval through the IMPEP process appears to be unnecessary and a duplication of resources.

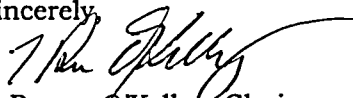
Currently, NRC accepts medical boards in states to approve authorized users on nuclear medicine licenses. NRC does not periodically review the approving board, nor is this an issue during the State IMPEP reviews. In the spirit of the NMP, the CRCPD is attempting to establish a program where States or private entities may apply to CRCPD to receive recognition and approval to administer an industrial radiographer certification program. The CRCPD Board believes that the NRC should support the efforts of a national certification oversight committee (under CRCPD), to recognize programs that certify industrial radiographers, in a manner similar to how NRC acknowledges medical boards that approve authorized users on a medical license.

The CRCPD Board requests that the Commission implement the policy on oversight of professional boards or organizations that approve either individuals or organizations to perform certain activities consistently for all regulated disciplines. The acceptance and review process should be the same for radiography and medical certifying entities.

If General Counsel determines that Radiography Certification Programs cannot be viewed the same as Medical Certification Programs, CRCPD will consider submitting a Petition for Rulemaking to address our concerns.

Thank you for your consideration. If there are any questions concerning the CRCPD Board position on this request, please contact me at 803-545-4403 or Okelletp@dhec.sc.gov.

Sincerely,



T. Pearce O'Kelley, Chair  
Conference of Radiation Control Program Directors, Inc.

D H E C



2600 Bull Street  
Columbia, SC 29201

Return Service Requested

RAD HEALTH

RETURN SERVICE  
REQUESTED

PRESORTED  
FIRST CLASS



02 1A  
0004356835 AUG 10 2006  
\$ 00.37<sup>1</sup>  
MAILED FROM ZIP CODE 29201

Janet R. Schlueter, Director  
OSTP  
Mail Stop C 310  
US NRC  
Washington, DC 2055

20000/9999

