

August 19, 2011

Mr. James Houf
American Society for Nondestructive Testing
1711 Arlingate Lane
P.O. Box 28518
Columbus, Ohio 43228-0518

Subject: CONCERNS ABOUT PASSING TEST SCORES FOR OUTSIDE AGENCY
PERSONNEL QUALIFICATIONS

Dear Mr. Houf,

Thank you for your letter dated May 17, 2011, (Agencywide Document Access and Management System (ADAMS) Accession No. ML111441228) regarding passing test scores for outside agency qualifications. The Nuclear Regulatory Commission (NRC) staff understands your concerns and we appreciate your input on this matter

As stated in the letter dated January 12, 2010, (ADAMS Accession No. ML100140091) from the NRC to the American Society of Mechanical Engineers Boiler & Pressure Vessel Code (ASME Code), the NRC became aware of a potential issue with the effectiveness of nondestructive examination (NDE) inspections at all operating nuclear power plant stations in the United States. In part, the concern related to the American Society for Nondestructive Testing (ASNT) nondestructive testing (NDT) personnel certifications that may not conform to ASME Code expectations. ASME Code, Section XI, IWA-2000, allows for outside agencies to test NDT personnel, and specifies a grade of 80% be assigned for those examinations a candidate passed unless actual numerical grades are provided. Due to the methods ASNT may have used to grade exams, including the possible use of psychometrics, ASNT could have considered scores lower than those specified in the ASME Code to be passing. If the actual test scores are not reported by ASNT, the tests in question would be assigned a score of 80%, in accordance with the ASME Code. Thus, personnel with potentially inadequate test results could meet the qualification requirements of ASME Code.

Title 10 of the *Code of Federal Regulations* (10 CFR 50.55a(b)) incorporates by reference the ASME Code, Sections III and XI. ASME Code addresses qualifications of the NDE personnel; thus these requirements become regulatory requirements with implications across the entire nuclear fleet. It was not the NRC staff's intent to endorse the above concerns but rather to make the ASME Code aware of them, thus allowing the Code the opportunity to determine the merit of the concerns in relation to Code requirements. While the staff certainly appreciates

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your assurances that ASNT certification examinations are developed, conducted, and graded with the utmost care, we have no direct jurisdiction over ASNT personnel certifications, thus the NRC pursued resolution of the concerns with the ASME Code.

Sincerely,

/RA/

Michele G. Evans, Director
Division of Component Integrity
Office of Nuclear Reactor Regulation

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with the utmost care, we have no direct jurisdiction over ASNT personnel certifications, thus the NRC pursued resolution of the concerns with the ASME Code.

Sincerely,

/RA/

Michele G. Evans, Director
Division of Component Integrity
Office of Nuclear Reactor Regulation

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