



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20540-0001

May 15, 1998

Robert K. Windsor
Executive Director
The American Society for Nondestructive Testing, Inc.
1711 Arlingate Lane
P.O. Box 28518
Columbus, OH 43228-0518

Dear Mr. Windsor:

The American Society for Nondestructive Testing, Inc. (ASNT) is hereby recognized as a Certifying Entity, i.e., an Independent Certifying Organization (ICO) based on our finding that your Industrial Radiography Radiation Safety Personnel (IRRSP) certification program meets the criteria established in 10 CFR Part 34, Appendix A. Individuals wishing to act as radiographers who are certified in isotope radiography through the IRRSP program are deemed to meet the certification requirement specified in 10 CFR 34.43(a)(1). This finding is based on your April 23, 1997, submission and your letters dated January 5, 1998, February 12, 1998, March 12, 1998, and April 17, 1998, which provided additional information and clarification for several items in the initial submission.

One residual issue requires attention to complete your application; however, it is not essential to authorize ASNT as an ICO. Specifically, in your April 17, 1998, letter, you indicate you will revise your program to further clarify and include more detailed procedures for processing requests for reinstatement. However, you note that because such procedures must be approved by certain ASNT governing bodies, the modified procedures will not be available until after the Summer meetings in July 1998. Based on your commitment to develop these procedures, we find this area acceptable. Once completed, these procedures are to be provided to NRC for review to ensure their adequacy and to complete the application file.

Completion of a formal training program is one of the critical elements for certification. While Appendix A of 10 CFR Part 34 does not specify that certifying organizations contact the cognizant licensing authority to confirm that the training courses cited by an applicant have been approved, we strongly suggest that ASNT incorporate procedures as suggested in our letters of March 9 and April 13, 1998. We believe that such procedures are appropriate, and would lend consistency with the practice of the States which are certifying radiographers.

Your April 17, 1998, letter also inquires if NRC would consider extending the deadline for implementing certification. Given that a year remains before the final deadline, we do not believe there is a need to consider extending the deadline at this time. However, you should be aware you always have the opportunity to petition the NRC for a rule change pursuant to 10 CFR 2.802.

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Robert K. Windsor, Executive Director

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Please be aware that should you decide to revise procedures which form the underlying basis for NRC's approval of the IRRSP program applicable to 10 CFR Part 34, Appendix A, such revisions need to be submitted and approved by NRC prior to implementation. Revisions which are only administrative in nature do not need to be submitted.

We want to commend ASNT on the extraordinary effort ASNT clearly devoted to developing its IRRSP program and the application to be an ICO. Throughout the lengthy process leading to mandatory certification, ASNT has exhibited the highest level of professionalism and sincere interest in protecting radiographers and members of the general public. Your tenacity is commendable. We are pleased to reach a successful conclusion and look forward to a continuing interaction with ASNT to further ensure public health and safety in industrial radiography.

Sincerely,
original signed by F. Combs/for D. Cool

Donald A. Cool, Director
Division of Industrial and Medical
Nuclear Safety
Office of Nuclear Material Safety
and Safeguards

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