



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

January 22, 2020

Mr. James E. Bennett  
Chief Technical Officer  
Certification, Technical, and  
Training Services  
The American Society for  
Nondestructive Testing, Inc.  
1711 Arlingate Lane  
Columbus, OH 43228-0518

SUBJECT: THE AMERICAN SOCIETY FOR NONDESTRUCTIVE TESTING,  
INCORPORATED CERTIFICATION PRACTICE FOR THE INDUSTRIAL  
RADIOGRAPHY RADIATION SAFETY PERSONNEL PROGRAM

Dear Mr. Bennett:

On May 15, 1998, The U.S. Nuclear Regulatory Commission (NRC) recognized The American Society for Nondestructive Testing, Inc. (ASNT) as an Independent Certifying Organization based on its finding that ASNT's industrial radiography certification program met the criteria established in Part 34 of Title 10 of the *Code of Federal Regulations* (10 CFR) (Agencywide Documents Access and Management System [ADAMS] Accession Number ML14245A364). As noted in that correspondence, any revision to ASNT's industrial radiography certification program that is administrative in nature does not need to be submitted to NRC for review. However, should ASNT decide to revise procedures which form the underlying basis for NRC's approval of ASNT's industrial radiography certification program applicable to 10 CFR Part 34, such revisions need to be submitted and approved by NRC prior to implementation.

We have reviewed ASNT document "Industrial Radiography Radiation Safety Personnel Certification Practice (ANST-CP-IRRSP), 2020 Edition," received by our office on June 17, 2019 via email. For clarity and consistency with NRC's regulations, NRC staff suggested edits to ASNT-CP-IRRSP on October 10, 2019 and January 8, 2020. The ANST-CP-IRRSP was reviewed against the criteria in 10 CFR Part 34, "Licenses for Industrial Radiography and Radiation Safety Requirements for Industrial Radiographic Operations," Appendix A, Radiographer Certification. Our review was limited to those portions of the document that relate to byproduct and source material, referred to as "radioactive materials" in ASNT-CP-IRRSP. As a result of our final review, we have no further comments relating to regulatory or technical matters related to ASNT-CP-IRRSP, 2020 Edition. We have determined that ASNT-CP-IRRSP continues to meet the requirements for industrial radiography certification programs. Furthermore, ASNT continues to be recognized by NRC as an Independent Certifying Organization.

As an Independent Certifying Organization recognized by NRC, pursuant to 10 CFR Part 34, Appendix A, Part I.13., ASNT is required to allow periodic review of its certification program and related records. Responsibility for oversight of NRC programs remains with NRC. However, we plan on continuing our dialogue with the Conference of Radiation Control Program Directors to cooperate in this area of mutual interest. We look forward to additional communication with you on this matter.

If you have any questions regarding the NRC's review, please contact me at (301) 415-2178 or ([David.Alley@nrc.gov](mailto:David.Alley@nrc.gov)) or Don Lowman at (301) 415-5452 ([Donald.Lowman@nrc.gov](mailto:Donald.Lowman@nrc.gov)).

Sincerely,

**/RA** Tomas Herrera for/

David Alley, Branch Chief  
Division of Materials Safety, Security, States,  
and Tribal Programs  
Office of Nuclear Material Safety  
and Safeguards

Enclosure:  
ANST-CP-IRRSP 2020

cc:  
Ruth McBurney, Executive Director,  
CRCPD

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DATED: January 22, 2020

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OFFICE	NMSS/MSST	RIV/DNMS	NMSS/MSST	NMSS/MSST
NAME	DLowman	JKatanic	DWhite	DAlley (THerrera for)
DATE	01/13/2020	01/14/2020	01/13/2020	01/22/2020

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