



H & G INSPECTION COMPANY, INC.

P.O. BOX 721856 • 713-498-6517

HOUSTON, TEXAS 77272

February 19, 2001

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

To Whom It May Concern:

Enclosed is a copy of correspondence that H&G Inspection, an industrial radiography company, has sent to the American Society for Non-destructive Testing (ASNT). ASNT is an official certifying entity designated by the NRC to provide industrial radiographer certification. It has come to our attention that the agreement states will no longer accept portions of ASNT's certification procedure, and so ASNT certification (in essence federal certification) is no longer valid in many instances in the majority of states.

This problem was known to ASNT, as was correctable, yet they have done virtually nothing about it for at least six months. This situation could have severe financial repercussions for both radiography companies and individual radiographers. A CRCPD meeting is scheduled soon to discuss the problem, but it may not solve all the issues.

While we are aware that ASNT is not a licensee of the NRC, it is our hope that conversation between these organizations might yield some meaningful solutions. Thank you for your attention to this matter.

Sincerely,

Craig Konieczny
Corporate Assistant RSO

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Evanston, Wyoming 82930

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Bob Doggart
ASNT
P.O. Box 28518
Columbus, OH 43228-0518

Mr. Doggart:

H&G Inspection Company, Inc., is an industrial radiography company headquartered in Houston, Texas, with offices in several other states. Our Evanston, Wyoming office is located in a non-agreement state and so we have an NRC radioactive material license in addition to various state licenses. Due to recent federal requirements mandating radiographer certification, H&G has utilized ASNT in its capacity as a certifying entity for some of our employees.

H&G Inspection has previously taken issue with the ASNT exam content and the lack of an adequate number of test sites and dates. We have documented these problems to relevant regulatory authorities and to ASNT. We have just now, however, learned of an incredibly serious problem in your certification process that would seem to demand an immediate explanation as well as a full-fledged emergency response from your organization.

H&G has been informed that the State of Texas, and apparently all other agreement states, refuse to accept ASNT certification cards with an exam code of 2 or 3 (x-ray machine or combination machine/radioactive material). This news was completely unexpected to H&G and to other radiography firms that we were able to contact. In conversation with the State of Texas, we have discovered that ASNT has been aware of this situation but has done virtually nothing to correct it, or to even inform potential radiographers of this complication. This means that for many radiographers, their certification is worthless in the vast majority of states. Their very livelihoods are jeopardized in many instances because they signed up for ASNT certification in good faith, and were not even treated to the common decency of being told about the problem. This is not only inherently unfair, it is criminally negligent.

This whole situation is exacerbated by the response, or lack thereof, of ASNT. Texas has told H&G that a conglomerate of agreement states asked for information from ASNT about its testing and certification procedures in an effort to accredit them as equivalent to state standards. The initial request was in August of last year and the eventual response from ASNT arrived in early February 2001. We are told that the information that was received is completely out of date (prior to 9-10 revisions by ASNT), and so therefore nearly useless. Why is ASNT so unresponsive and uncooperative? This is the exact same type of reaction that H&G received when we inquired into the relevance of some of the exam content and even pointed out 18 errors in a study reference that was reluctantly provided to us. Even then, ASNT was loath to take any constructive outside input, and now it seems that the organization has gone a step farther and outright dragged its heels in a situation that could prove financially calamitous to both radiographers and radiography companies.



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Contracts and jobs that have already been established for the near future are now in peril because of personnel shortages due to this certification problem. H&G must face the possibility of losing significant income due to postponement or cancellation of these projects. Additionally, these delays and breaks in contract can seriously denigrate our corporate name which potentially affects our long-term ability to bring in new clients. Maybe most unfair, the earning potential of radiographers working under these limitations of where they can work is negatively affected. ASNT did not offer full disclosure of this problem to licensees or individuals even when it was aware of the dilemma, and failed to swiftly work in conjunction with the states to correct the problem. ASNT is therefore at least partially responsible then for difficulties that may very well arise from this predicament.

According to Texas, a CRCPD meeting is scheduled shortly to address this problem. Even if it is decided that the agreement states will accept in total the ASNT certification procedure, the question remains as to the training status of the affected radiographers who were certified before the process was approved. If they are not grandfathered in, which is a distinct possibility according to information we have received, then these individuals could very well have wasted multiple years of documentable training. The State of Texas, for example, requires one year of *certified* radiographer experience before a person qualifies for trainer level. If the ASNT certification time is negated, such individual must obtain new certification, and wait another year before becoming eligible. Previous certification time plus the additional year would all be squandered.

It is our expectation to receive some type of explanation as to how events came to this loggerhead, and why corrective action was not taken more quickly. H&G certainly hopes that ASNT is doing all it can to obtain certification equivalency, and to help the radiographers that they have harmed by actively pushing to allow for grandfathering. Questions of liability are also at issue, and it is the fervent desire of H&G that measures taken now are not a day late and a dollar short.

Sincerely,

Harry W. Gibson
Corporate RSO

copies: Nuclear Regulatory Commission
Texas Department of Health, Bureau of Radiation Control
George Moran, President NDTMA
Donny Dicharry, Source Production Equipment Co.