



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

October 17, 2014

Mr. James W. Houf, Senior Manager
Technical Services Department
The American Society
for Nondestructive Testing, Inc.
1711 Arlingate Lane
P.O. Box 28518
Columbus, OH 43228-0518

Dear Mr. Houf:

We have reviewed The American Society for Nondestructive Testing (ASNT) document "Industrial Radiography Radiation Safety Personnel Certification Practice (CP-IRRSP-1A), Revision 12," received by our office on September 24, 2014. This document was previously reviewed by the U. S. Nuclear Regulatory Commission (NRC) staff in its capacity as non-voting resource members to the Conference of Radiation Control Program Directors (CRCPD) G-34 Committee on Industrial Radiography. Comments previously provided by NRC to the G-34 Committee have already been provided to ASNT through the G-34 Committee and have already been incorporated by ASNT into the CP-IRRSP-1A document submitted to NRC for review.

On May 15, 1998, NRC recognized ASNT as an Independent Certifying Organization based on its finding that ASNT's industrial radiography certification program met the criteria established in 10 CFR Part 34 (ADAMS Accession 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.

The revisions made by ASNT to its CP-IRRSP-1A were 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 material, referred to as "radioactive materials" in ASNT CP-IRRSP-1A. As a result of our review, we have no comments relating to regulatory or technical matters related to ASNT's CP-IRRSP-1A, Revision 12. We have determined that ASNT's CP-IRRSP-1A continues to meet the requirements for industrial radiography certification programs. Furthermore, ASNT continues to be recognized by NRC as an Independent Certifying Organization.

Although our review of CP-IRRSP-1A, Revision 12, focused on the technical and regulatory aspects, as a courtesy, and for clarity of the document, we would like to offer a few editorial comments, which are identified in the Enclosure.

If ASNT makes these or other editorial corrections, CP-IRRSP-1A, Revision 12, does not need to be resubmitted to us for review; however, we request that a copy of the final published version of CP-IRRSP-1A, Revision 12, be provided to NRC for our record.

As an Independent Certifying Organization recognized by NRC, pursuant to 10 CFR 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 CRCPD 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) 415-3340 or (Laura.Dudes@nrc.gov) or Dr. Janine Katanic, CHP, at (817) 200-1151 (Janine.Katanic@nrc.gov).

Sincerely,

/RA/

Laura A. Dudes, Director
Division of Materials Safety, States, Tribal,
and Rulemaking
Office of Nuclear Material Safety
and Safeguards

Enclosure:
Editorial Comments

cc:
Ruth McBurney, Executive Director, CRCPD

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Sincerely,

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Laura A. Dudes, Director
Division of Materials Safety, States, Tribal,
and Rulemaking
Office of Nuclear Material Safety
and Safeguards

Enclosure:
Editorial Comments

cc:
Ruth McBurney, Executive Director, CRCPD

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NRC Editorial Comments on ASNT CP-IRRSP-1A, Revision 12		
Item	Section	Comment
1	Definitions – Institution Recognized by ASNT	First sentence: Insert the words “licensed or” in front of the words “registered by an Agreement State.”
2	References – A	The title of 10 CFR 34 should be changed to “Licenses for Industrial Radiography and Radiation Safety Requirements for Industrial Radiographic Operations.”
3	Part I, Section 2.3.a	Second sentence: Change “radiations” to “radiation.”
4	Part I, Section 3.1.2	First sentence: Delete the “.” after the word “representative.”
5	Part I, Section 3.1.2	Fourth sentence: Delete the word “the” before the words “a form.”
6	Part I, Section 4.1.1	Define “ACCP.”
7	Part I, Section 8.2.1	Define “NDTMA.”

Enclosure