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Formerly MAGNAFLUX Quality Services

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Secretary
US NRC
2120, L. Street N.W.
Washington, DC 2055

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Attn: Docketing and Servicing Branch

Subject: Central Certification

Secretary:

We have a number of questions and comments as to central certification of radiographers.

- I. Does this certification apply to xray?
If not we will be required to take two tests for the same thing.
- II. As in ASME or Mil std. 410 require certification every 3 years "ASME" for work on Section XI and III. Why then can you certify for five years.
- III. Under the present regulation our company provides us with the required training, and experience and/or verifies that we have a minimum of 40 hrs. training as well as 520 hours of direct experience prior to qualifying us to work as radiographer with sealed sources.
What is ASNT going to do that would benefit the industry.
- IV. Who is going to pay for an individual to be tested or supposedly trained by ASNT? The applicant or employer?
- V. If you are going to follow a standard to qualify radiographers or assistant radiographers why choose Texas, which as the highest incident rate per radiographer of any of the 50 states.
- VI. If a person has a certificate stating he is a radiographer per the central certificate system, would he/she still have to test with each individual company they work for? If you answer yes then this is a duplication of effort. If you answer no then the person would not be complying to that company's radiation safety operation emergency procedures.

Conclusion: We at this time are of the opinion that central certification does no one any good except that it puts money in ASNT's operating account.

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