



The American Society for Nondestructive Testing, Inc International Service Center

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March 30, 2020

Mr. David Alley and Mr. Don Lowman
Division of Materials Safety, Security, States and Tribal Programs
Office of Nuclear Material Safety and Safeguards
United States Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Subject: The American Society for Nondestructive Testing, Inc. (ASNT),
formal request for exemption to 10 CFR Part 34, Appendix A-II,
paragraph 5 with the United States Nuclear Regulatory Commission.

Dear Mr. Alley and Mr. Lowman,

Please find this letter as a formal request for exemption to 10 CFR Part 34, Appendix A-II, paragraph 5, which states the following: "Provide a certification period of not less than 3 years nor more than 5 years". ASNT requests this exemption under 10 CFR 30.11 (a), which states: "The commission may, upon application of any interested person or upon its own initiative, grant such exemptions from the requirements of the regulations in this part and parts 31 thru 36 and 39 of this chapter as it determines are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest".

The rationale behind this request is that ASNT's examination service provider, Pearson Vue, has closed all company-owned Pearson Professionals Centers in the U.S. and many other countries due to the public health emergency caused by the COVID-19 pandemic. Many individuals that had recertification exams scheduled were cancelled and tentatively rescheduled for when the test centers reopen. There are a very limited number of 3rd party Pearson test centers open at this time and with restrictions on travel, it has become increasingly difficult for individuals to schedule an exam. Scheduling will become increasingly difficult or nonexistent as this pandemic situation continues to spread across the country. Many of the individuals that have had their scheduled recertification exams impacted by these closures work in service and defense industries that are continuing to work and rely on these certified radiographers to maintain operations.

In accordance with the requirements of ASNT's Industrial Radiography Radiation Safety Personnel (IRRSP) program document, ASNT Practice No. ASNT-CP-IRRSP, 2020 Edition, certifications remain valid for a period of 5 years from the date of the successful written examination completion, unless suspended or revoked for cause. ASNT IRRSP certifications expire on the last day of the month. ASNT has identified the following number of individuals that have certifications expiring over the following months: March-42, April-57 and May-62. ASNT's Certification Management Council (CMC) has brought forward a motion to extend current certifications and take exception to the ASNT-CP-IRRSP program document requirements, due to this public health emergency caused by the current COVID-19 pandemic. The CMC voted to approve the motion, pending acceptance by the NRC of ASNT's request for exemption to 10 CFR Part 34, Appendix A-II, Paragraph 5.

ASNT proposes to extend IRRSP certifications for individuals affected by the test center closures for up to 90 days, not to exceed June 30, 2020. Those individuals expiring in the months of March, April and May 2020 will be contacted by ASNT to determine if they intend to renew their certifications. Certificants must submit an application for renewal to ASNT prior to being granted an extension of their certification. This extension period will allow individuals the needed time to schedule and sit for their examinations once the test centers open. Certifications will expire 5 years from the date of their current certification expiration date. Those individuals that let their certifications lapse and reapply later will restart their 5-year certification cycle once they successfully complete the written examination. This is due to the fact that ASNT is only granting the extensions for currently certified individuals that have applied for recertification, allowing them to sit for their exams at a later date in response to the test center closures. Once an extension is granted, the individual will be sent a notification by email that their certification has been extended to June 30, 2020. The individual's record will be updated in ASNT's databank and in the searchable [Certificate Holders](#) directory on the ASNT website. This will allow any jurisdictional authority the ability to confirm that an individual has a current certification. ASNT will continue to monitor the evolving impacts of the spread of COVID-19 and revisit the proposed plan if further developments in the public health emergency warrant additional extensions past June 30, 2020. ASNT's current plan and intention is to only extend certifications until June 30, 2020. However, the uncertainty of possible further delays in scheduling after test centers have opened, may require a revised timeline to provide for a reasonable amount of time to schedule at available test centers. For the purposes of this currently proposed request for exemption to the NRC, ASNT requests that approval by the NRC be granted for a maximum period of 6 months, not to exceed September 30, 2020. This revised timeline would only be imposed if deemed absolutely necessary by issues beyond ASNT's control. Such actions would be communicated to the NRC, prior to any action taken.

In regards to the provisions for exemption under 10 CFR 30.11(a), "will not endanger life or property or the common defense and security and are otherwise in the public interest", ASNT responds as follows: In addition to the previously stated need for the emergency actions proposed, ASNT IRRSP certified individuals that are requesting recertification are at the end of a 5-year certification period as a minimum, reinforcing the fact that they have sufficient experience safely conducting radiographic operations. Candidate's for recertification are current and active in a formal radiation safety program where their qualifications, training and experience are kept up to date and current by their respective programs. For this reason, ASNT believes that granting extensions for the written examinations under the current emergency situation does not create a foreseeable risk to the public interest.

ASNT respectfully requests that the NRC consider this request for exemption and provide ASNT with a letter of approval as soon as possible. ASNT must react quickly to this emergency situation, as we have certificants that will be expiring tomorrow, March 31, 2020.

Please contact me with any questions or if further information is required at (614) 384-2440 or by email at ddidion@asnt.org.

Best regards,

Don E. Didion III
ASNT Director of Certification

Cc: Neal Couture, ASNT Executive Director
Tim Jones, ASNT Deputy Executive Director
Joe Mackin, ASNT CMC Chair
Bob Feole, ASNT IRRSP Division Chair