



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

February 5, 2025

Mr. Paul Lang, Executive Director  
ASNT Certification Services, LLC.  
912 Gemini Street  
Houston, Texas 77058

SUBJECT: REQUEST TO AMEND ASNT CP-IRRSP QUALIFICATION REQUIREMENTS

Dear Mr. Lang:

This letter is in response to your April 3, 2024, letter regarding amendment of the IRRSP Program Document (ASNT Practice No. CP-IRRSP) to reduce the minimum required on-the-job training (OJT) hours for radiographers using radioactive material from 320 hours to 200 hours. A copy of the letter may be found in the NRC's Agencywide Documents Access and Management System using the Accession Number [ML24099A195](#). NRC staff understands from your letter and extensive previous conversations that ASNT is seeking a review of the basis for the reduction and clarification of the hourly requirement to be certified under Appendix A to Part 34, particularly regarding the "hands-on" component of the OJT process. The NRC staff agree that 200 hours of hands-on training with radioactive materials as part of 2 months (or more) OJT is sufficient to satisfy the training requirement in 10 CFR § 34.43(a)(1) to be certified under Appendix A to Part 34.

10 CFR § 34.43(a)(1) states, in part, that the radiographer must have a minimum of 2 months of on-the-job training. NUREG 1556 Volume 2, Rev.1, Program-Specific Guidance About Industrial Radiography Licenses, Appendix E provides guidance by listing 2 months or 320 hours. The NRC understands that the 2-month, or 320 hours, of OJT may include x-ray activities, driving to and from job sites, paperwork, and other related activities in addition to hands-on radioactive-source radiography. The regulation and the guidance do not separate out the hands-on training component for radiographic activities from other OJT activities.

Based on discussions with ASNT and the state of Texas, the NRC staff agrees that 200 required hours of hands-on training is an appropriate minimum hourly specification for hands-on activities as part of the required 2 months of OJT training. Those 200 hours could include the use of radiation sources as well as performance of radiation surveys and radiation safety related activities. However, the 200 hours should not include x-ray radiography, film development and interpretation, darkroom activities, travel, safety meetings, classroom training and/or other office ancillary duties associated with the job that do not involve handling sources of radiation. To meet the 2-month OJT requirement of 10 CFR § 34.43(a)(1), the 200 hours of hands-on radioactive materials radiography training must be part of a two-month full-time (320-hour) or longer OJT program.


As a certifying entity which also includes x-ray certification, the state of Texas' approach regarding hands-on OJT for radiography meets the intent of the rule by specifying the number of hours a radiographer must have conducted hands-on radioactive-source radiographic activities. The NRC considers this approach to focus on safety and provide reasonable assurance that the radiographer is meeting the intent of the rule by documenting the 200 hours of hands-on OJT.

The NRC has determined that this practice does not impact the effectiveness of the safe use of radioactive material during radiographic operations and that the clarification of hours will not adversely impact public health and safety.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

If you have further questions on this matter, please my staff [Booma.Venkataraman@nrc.gov](mailto:Booma.Venkataraman@nrc.gov), or telephone at (301) 415-2934, or Michelle Hammond by e-mail at [Michelle.Hammond@nrc.gov](mailto:Michelle.Hammond@nrc.gov), or telephone at (301) 415-3257.

Sincerely,



Signed by Bloomer, Tamara  
on 02/05/25

Tammy E. Bloomer, Acting Division Director  
Division of Materials Safety, Security, State,  
and Tribal Programs  
Office of Nuclear Material Safety  
and Safeguards

cc: Robert Feole, IRRSP Subcommittee Chair

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**ADAMS Accession Number: ML25030A069**

**\*via email**

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