



The American Society for Nondestructive Testing, Inc.

September 1, 1999

U.S. Nuclear Regulatory Commission
Materials Safety Branch
Division of Industrial and Medical Nuclear Safety
Office of Nuclear Materials Safety and Safeguards
Washington, D.C. 20555-0001

Attention: Mr. Bruce Carrico

Reference: IRRSP Exam Translations for Puerto Rico

Dear Mr. Carrico:

As the USNRC is aware ASNT has been approached by Alonso & Carus Iron Works in Catano, Puerto Rico for IRRSP examinations in Spanish for the RAM only examinations. There are four (4) individuals involved in this request. The USNRC has been directly involved through Mr. David Collins of your Region 2 office in Atlanta, Georgia and has verified all the relevant factors and has concurred with this request.

ASNT proposes to take the following actions, with your approval, to administer these examinations:

1. All ASNT examinations are developed in accordance with the provisions contained in it's original submittal of 5 January 1998, Section 21 relative to 10 CFR 34, Appenix A "Requirements for a Written Examinations" .
2. ASNT proposes to meet the request for a RAM examination, as noted above, using items from its validated data banks and contained in an existing and approved examination form constructed in accordance with ASNT's approved process and procedures as contained in it's original submittal noted above.
3. ASNT currently has, as required by good psychometric processes, several forms of examination. It is ASNT's intention to take an existing, validated and approved examination currently having field use and translate this examination into Spanish. The translation would be performed by a native speaking technically competent individual who is currently a member of the ASNT IRRSP Committee.
4. When the translation is complete the examination will be back-translated in accordance with established psychometric processes by a technically competent individual with native speaking skills in both languages. It is ASNT's intention to utilize individuals who come from the same cultural background and whose knowledge of the technical subject material is based upon colloquial understanding in addition to exposure to everyday use of the language in a working setting.
5. By utilizing an examination in current use with existing statistical data ASNT will also be able to analyze the resulting examination data for evidence of bias or any abnormal deviation from know results.



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6. ASNT, because of the restricted and regional nature of the request, will issue any subsequent certification containing restrictive statements as to the basis of the qualification and certification. The certification card issued will contain the wording that this certification is restrict to Spanish speaking areas of Puerto Rico only.

7. ASNT considers this matter an isolated and special case and does not request consideration of this request other than in the light of this specific examination for these individuals and based only upon the unique relationship of Puerto Rico in regard to compliance with USNRC regulations.

Based upon the rationale noted above ASNT requests that the USNRC extend approval to what ASNT considers to be a special case applicable only within the context of the above situation for the specific individuals involved.

Please contact either Mr. Patrick Shively of the ASNT Technical Services Department at (800) 222-2768 Extension 242 or Mr. Robert Feole the Chair of the IRRSP Committee at (401)943--3141 for any questions relative to the above.

Very truly yours,

Desmond Dewey,
Executive Director

c: Mr. Robert Feole, Chair IRRSP
Mr. Stephen Black, Chair CMC
Mr. Marvin Trimm, Vice Chair CMC
Mr. Patrick Shively, IRRSP Certification Specialist

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