ICNDT "the World organization for NDT"

INTERNATIONAL COMMITTEE FOR NON-DESTRUCTIVE TESTING

WG1 on NDT Qualification and Certification

A meeting was held on Saturday 14th April 2012, in room MR12 at the International Convention Centre (ICC), Durban, RSA, prior to the 18th WCNDT

Draft minutes

1) The meeting was opened at 08h30 by the WG1 Chairman, John Thompson. Manfred Johannes welcomed all attendees to South Africa, and to the city of Durban.

2) Attendance and apologies for absence.

   a) WG1 Members present at the meeting were A Mullin, D Barnett, D Marshall, G Aufricht, J Guild, J Rufino, J Thompson, M Purschke, M Farley, N Ooka, P Fallouey, R Holstein, R Rodriguez, W Holliday and SK Babu.

   b) Observers present were D Gilbert and R Potter.

   c) Apologies for absence were noted in respect of A Khan, H Neeson, RS Geng and J Zirnhelt.

3) The draft agenda was adopted with the addition of a new topic 4 (minutes of the last meeting). There were no additional business proposals.

4) The minutes of the last meeting (Cancun, 1st October 2011) were confirmed accurate, and all assigned actions were confirmed completed or included in the present agenda.

5) WG1 Membership.

   a) John Thompson to be replaced at future meetings by BINDT nominee Peter Milligan.

   b) Future SAINT nominee will be Jim Guild, replacing Hugh Neeson.

   c) ASNT nominee to attend future meetings to be confirmed. **Action: Wayne Holliday**

6) Status of ICNDT MRA Documents & PCB Approval Documents, and ICNDT Procedures related to WG1 activity (OPs 15, 18, 19, & 20).

   a) The status of Operating procedures required to cover WG1 activity and the implementation of systems developed through WG1 was confirmed by the ICNDT Chairman, Mike Farley, who gave a short presentation on the four stage process proposed for ICNDT approval of the MRA and PCBA documentation developed and put forward by WG1:

      i) Approval of enabling documents, i.e. OPs 18, 19 and 20

      ii) Approval in principle for implementation – item 10.5 of Durban GA Agenda

      iii) Members of Certification Executive Committee nominated by IEC to be ratified at item 10.5 of Durban GA Agenda

      iv) If approved, detailed implementation by IEC and CEC post Durban

   b) The meeting was presented with comments that had been submitted by ASNT on 28 November concerning the WG1 developed systems for the ICNDT Multilateral Recognition Agreement (for NDT personnel certification) and Assessment and ICNDT Approval of NDT Personnel Certification Bodies.

   c) The ASNT Comments were discussed at length and WG1 responses were agreed as follows after extended debate. In every case an open ballot was conducted to confirm WG1 agreement of the ICNDT response to the ASNT comments, and in every case, 13 votes were cast for the proposed response with one vote against registered by Wayne Holiday on behalf of ASNT.

ASNT's point #1

It appears that the proposal does not adequately address the reality that certification requirements are not uniform across industries, regions, markets and countries. In fact, the proposal ignores these differences when it stipulates that all signers are to promote the recognition and acceptance of certificates issued by PCBs that are registered under the MRA. In practice, we believe that [the signatory] organizations will neither be aware of the certification needs in every other country that is part of the MRA nor are they likely to know how well every other PCB's certificate will meet the needs of the industries, markets and companies within their own sphere. Without ascertaining the suitability of a given certification for the organization's needs, we believe the required promotion will ring hollow, as it will not be based on an assessment of the alignment of the actual substance of the programs with the full needs of the organizations responsible for the quality of inspection.

Agreed ICNDT WG1 Response (in an open ballot, voted for by 13 members, with one vote against registered by ASNT)

This point is well explained in the ICNDT Guide and in the ISO9712 standard. Both make clear that it is the Employer's responsibility to ensure that the NDT person's certification is adequate for the particular task he is to execute. The Employer may however take some comfort from using Certification that is promoted and recognised within the ICNDT MRA, since the 'recognition' is predicated upon the accreditation of the registered PCB's program by a competent body. The [17 years] experience within Europe has been that this is a useful foundation upon which to base acceptance of certification.

We collectively need Certification schemes to provide much more detail on how they implement the Standard, and this could be a new field of activity for WG1 which we hope ASNT and other members will wish to support.

ASNT's point #2

It was noted in the [ICNDT EC] response that compliance with the applicable standard(s) does not necessarily address local industry requirements. While this appears to be a correct assessment of a shortfall in the proposed program, there is no remedy proposed. And the omission of a remedy not only devalues the MRA for the purpose of determining the suitability of a certification for an organization's needs, but its absence may wrongly be taken to imply a determination of suitability that was not made.

Agreed ICNDT WG1 Response

This is covered by the response to point 1, but it is worth reiterating that the employer, who is ultimately responsible for the competence of inspectors engaged on any particular task, must ensure that personnel are adequately qualified for the work in hand. The experience is that the MRA provides a 'higher degree of confidence' that employers and industry in general find useful.

ASNT's point #3

We are also concerned with the impact this program may have on ICDNT and its members. Recommending and approving certification programs are serious undertakings and organizations that are party to such activities may be subjecting themselves to significant liability from numerous sources. Even a successful legal defence can be quite costly, and aside from the risk to ICNDT itself, ICDNT does not appear to fully indemnify either its members or the participants in these proposed programs.

Agreed ICNDT WG1 Response

We have discussed this with a legal advisor who has knowledge of liabilities and NDT, and with potential insurers.

ICNDT must accept responsibility for the correct implementation of the MRA and PCBA schemes (howsoever named) in accordance with its procedures, which will be published, and can take out liability insurance against claims, including defence costs. ICNDT cannot be responsible for what others (Members, signatories of the MRA, employers, etc.) do, that is their responsibility and we will have a disclaimer clause to that effect.

ASNT's point #4

Nor is it clear that the proposed MRA would be sustainable, especially if the effort required ensuring diligence in assessment, oversight and administration becomes significant. ICNDT has no staff of its own and its financial resources are minimal. We strongly recommend that a business plan be developed; outlining the implementation plans, revenue and expense projections, and contingencies for staffing should the currently interested volunteers be unavailable. We believe that requesting approval without those is quite premature.

Agreed ICNDT WG1 Response

The CEC will be required to produce a self-sustaining business plan for approval by the IEC before implementation.

d) W Holiday stated that ASNT considered that the ICNDT responses failed to address ASNT's concerns, and that the MRA and PCBA systems should not go forward for implementation at this time. In particular, ASNT did not agree that the MRA would result in a higher degree of confidence in the certification concerned, and that the liability issues related to both MRA and PCBA implementation were under-estimated.

e) The WG1 majority view, expressed in open ballots, was that the MRA and PCBA systems were of great potential benefit to the world NDT community as a whole and should therefore be implemented without further delay.

7) Implementation plan for MRA and PCBA systems.

a) A resolution was debated and agreed concerning the recommendation to ICNDT on the implementation of the MRA and PCBA systems developed by WG1. The proposed wording was: "WG1 recommends the implementation of the MRA and PCBA in accordance with OPs 18, 19 and 20, subject to the wording on the certificates, appropriate insurance and liability statements and a sustainable business plan all being approved by the IEC".

b) A vote was taken on the draft resolution, with 13 voting for and 1 against (Wayne Holiday for ASNT).

8) Status of the ICNDT Guide.

The ICNDT Chairman, Mike Farley, confirmed that the ICNDT Guide, reviewed and revised by WG1 under an action placed upon it in the ICNDT Strategic Plan, was approved for publication, and that 1,000 copies had been printed for distribution to delegates of the 18th WCNDT.

9) Personnel certification developments in the nuclear sector

a) The WG1 Chairman presented papers covering (i) the activities of a World Nuclear Association (WNA) Cordel group - including a survey to gather data on NDT personnel certification - and (ii) a report from the ASME Exploratory Sessions on NDE Personnel Certification to the Technical Oversight Management Committee (ASME TOMC report).

b) Following extensive discussion it was agreed that WG1 should register a formal interest in such activities and seek official liaison status with the ASME TOMC and WNA.

10) WG1 Action plan.

A review of the WG1 action plan, which had been worked upon continuously for the past four years by WG1 members, was presented by the WG1 Chairman, who indicated the status of progress on each item in the plan. Most of the items which were finite in terms of goals set were noted as having been achieved, and items that were on-going by nature were agreed to be carried forward into a future strategy or action plan. **Action: ICNDT Chairman.**

11) Introduction to proposed new work items (see Annex A for detail).

a) A proposal for administration of practical examinations had been developed by SK Babu, and it was agreed that this be incorporated into a future strategy or action plan.

b) Similarly, a guideline for company authorisation had been proposed by M Johannes, and it was agreed that this be incorporated into a future strategy or action plan.

c) The present chairman urged the future participation in WG1 of regulatory bodies and authorities, either as liaison members in attendance or in receipt of papers.

12) Dates and locations for future meetings

There was discussion about the date and location for the next meeting. It was generally agreed that a further meeting should be convened this year and a BINDT conference on Certification (Luton, 20-21st Nov2012) and the ASNT Fall Conference were suggested as possible opportunities, but no specific date, event or location was decided.

13) There being no other business, the meeting was adjourned at 13h00 on Saturday 14th April 2012 with thanks being recorded for the facilities and refreshments provided by SAINT. The members recorded their thanks to the retiring Chairman, John Thompson for his diligent leadership as Chairman for four years and welcomed the proposal by ICNDT Chairman Mike Farley that Alexander Mullin should be nominated as the new Chairman.

Annex A – New Work Item Proposals

From Sajeesh Babu

WG1 is working towards Harmonization through the MRA, although compliance to EN ISO 9712 would assist harmonisation, I still find we have a common gap between PCB'S on the administration of Practical Examinations.

If we look into the way examinations are administered by PCB's some would meet minimum requirement of the standard (2 specimens for one sector), some would exceed the requirement. The group could draft a guideline for PCB's (the guideline could cover the number of test specimens, type, difficulty of discontinuities, validation, etc.)

I hope this could be part of the future plan to have a 'Guideline for Administration of Practical Examinations'.

From Manfred Johannes

I agree that the revised ICNDT guide, to a certain extent, addresses the obligations and duties of the employer of NDT practitioners very well. It does however not guide the company who uses NDT as part of the production or manufacturing process on how such a company can assure that they purchase the NDT which they need to fulfil the code requirements.

It is a fact that in South Africa (and for that matter also worldwide) the "user of NDT services" (could be a main contractor) is guided by the approved inspection authority (AIA), who is again appointed by the Department of Labour to oversee safety of plant and "meeting" code requirements by the main contractor.

The result of this practice is an incestuous relationship, in that the AIA determines the inspection scope, passes comment on the NDT to be performed, evaluates the results and signs the work off without having neither any NDT practitioner qualification nor any certification in NDT, and last but not least, does not employ a NDT Level III practitioner.

The main contractor must be educated regarding the steps that he has to undertake to assure that he pays for quality and state-of-the-art NDT services. Some of these steps are addressed in PANI 3 as well as in the 4 documents which were compiled as a result of PANI 3. These documents can be summarized into a "Guideline for users of NDT services".

The AIA needs to be guided in this document, as to what their responsibilities are. They surely do not determine the scope of the NDT inspection, they do not prescribe what NDT technologies and techniques are to be applied etc. Their purpose is to evaluate the NDT inspection plan, which is presented to them by the main contractor and they must assure that the plan presented to them meets the applicable code requirement and attest to this. They have to communicate their findings which could include a request for expansion of the scope etc. The main contractor cannot relinquish the responsibility for the NDT effort, by passing it down to the AIA - this changes the AIA into being judge and jury and constitutes the incestuous relationship alluded to earlier.

The "new guide" is already a major step ahead regarding the quality of the service offered by NDT service companies. In my opinion a second guide for the "users of NDT services" - the employers of the NDT service companies - is still sorely missed and will elevate the NDT industry to the next notch.

This - the practical examinations - will always be a problem, as it is very difficult to control these. A "Guideline for Administration of Practical Examinations" will in deed help in getting the same "things" done worldwide. The problem will however not disappear.

Another small step would be a "Guideline for company authorisation, as required in EN ISO 9712". It is at the coal front where the work has to be done and where the suitability and competence of the NDT practitioner has to be spot on.

Authorisation is specifically there to assure, that the parties agree on what is required - what techniques, what equipment, which skills, which experience etc. Such a Guideline for Authorisation will contribute to stopping the practice where end users only insist on a certain certification certificate, issued by an approved PCB or AUB. This is not enough and has in the past lead to bad NDT being performed. (This also applies to SNT-TC-1A - where a PANI 3-approach is also not assured in the written practice!)

My proposal is that we devote time and money to such a "Guideline for Company Authorisation". In my opinion the results and recommendations as published in the PANI 3 report, together with the four guidance documents, should be used as a basis for the guideline or better the guideline should be a "key" to facilitating and implementing "good NDT practice" as documented in these 5 documents.