



Introduction

This is the final article in the NDT Certification Series and considers what happens after certification. First of all, however, a revision of any changes which have taken place with the documentation and standards since the last article.

First of all, the PCN Gen document (CD) is now Issue 3 Revision E dated 1/10/02 for implementation on 1st January 2003. There are no significant changes to the document. PCN has introduced a Certification Programme for Welding Inspection personnel and details are available from PCN.

Also from January 2003 you will have seen that PCN will be introducing a PCN Exam levy of £36.50. This is different from the current PCN Certification levy with different rates for different levels (see the News Item in October Insight 202 page 640).

Finally, just to reiterate what I have said before about proposed standards and documents, e.g. ISO 9712 draft and the joint NAS 410/EN 4179 document. Until it is a published standard it cannot be used, and even if it is published the Prime Contractors will need to agree to accept it prior to Companies changing their Written Practices.

Now onto this month's Article – "After Certification".

Clarification of Terms

It is first necessary to clarify what I mean by 'certification' in this Article. I refer to the Certification of the Operator by the employer, which is the NDT Technician's authority to work on a particular method at a particular level.

This Certificate (authority to work) is only applied by the Employer once all aspects of the requirements of the Written Practice are met or, in the absence of a Written Practice, all criteria necessary to give an Employer confidence in issuing the Certificate to Work Certificate. this will include Training Record, Education Record, Eye Test, Exams and Level 3 Signature as a minimum.

A number of things can now happen to this Certificate (Authority to Work) and different documents/standards are different words for what are essentially the same event. Here are some of these words – less, lapse, resolution, suspension, expiration, renewal, recertification, re-approval, invalidation. I appeal to Certification Standards writers to try to bring together these words under a standard vocabulary. Here is my review and proposal for these words.

1. Renewal and Recertification

The Authorisation to work will have a validity period in line with the Written Practice – being 3 or 5 years after which the Authority to Work expires. This will coincide with the Results of the Examination Programme, either Central or Employer based. Such Certificates always have an expiry date on them.

Two definitions have evolved here:

Renewal is essentially the reinstating of the Authority to Work without examination, usually based on some documented procedure for demonstration of continuing satisfactory performance.

Recertification implies that an exam has taken place and that the Employer's Authority to Work is reinstated, based on an Examination Result Notice – either conducted centrally or by an employer – but an exam has taken place. (Note, some systems use the term 're-approved' here.)

2. Invalidation

PCN/EN 473 Certificates can be invalidated under the following conditions (Note that other systems have similar reasons for invalidation, loss, revocation etc. as well):

- in any industrial sector which is not covered by the certificate (unless the holder successfully completes a supplementary examination for the industrial sector);
- at the option of the British Institute of NDT after reviewing evidence of unethical behaviour (see CP27 – PCN Code of Ethics);
- If examination or certification fees are not paid when due;
- if the individual fails to satisfy the criteria for visual acuity and colour perception;
- if a significant interruption (see below) takes place in the method for which the individual is certified;
- from the date of issue of notification of failure in a PCN examination for recertification;
- in the case of certification for industrial radiography, if the period since the certificate holder has achieved success in a PCN (or recognised equivalent) radiation safety examination exceeds five years;
- all certificated personnel are required to keep a register of complaints made against them within the scope of the certificate of competence (see also PCN document CP27 – code of Ethics for PCN certificate holders). Failure to keep such a register or failure to enter valid complaints in it will be construed as a misuse of the certificate and appropriate penalties will be applied, see below. The register of complaints must be made available to the British Institute of NDT on request; also
- the penalty for misuse of PCN certification in all cases is invalidation of the certificate. If the misuse was in the public domain, publication of the transgression may also be undertaken. Any misuse which appears to be an infringement of the law, will result in the matter being reported to the police.

Significant interruption is an absence (or change of) work activity which prevents the holder of PCN certification from practising the duties corresponding to his or her level in the method and sector(s) for which certification was issued, for (a) a continuous period in excess of 365 days or (b) two or more periods for a total time exceeding two fifths of the total period of validity of the certificate.

Note 1: Legal holidays or period of sickness or courses of less than thirty days are not taken into account when calculating the interruption.

Note 2: ISO 9712 defines a 'significant interruption' as "An absence or a change of activity which prevents the certified individual from practising the duties corresponding to his level in the method and the industrial sector(s) for which he or she is certified for a continuous period exceeding one year"; ISO 11484 defines this as "an absence or a change of activity which prevents the certificated individual from practising the duties corresponding to the level in the method and the industrial sectors) for which he/she is certificated, for one or more periods for a total time exceeding 1 year within the period of validity". In this matter, the PCN Scheme defaults to the EN 473 criterion.

So should the PCN Certificate become invalid, then so will the Employer's Authority to Work. (Note, some standards use 'lapsed' and 'revoked' here – I prefer 'invalidated')

3. Suspension

An employer may suspend the Authority to Work as follows:

Approval shall be suspended when the periodic physical examination is overdue, when employment with the current employer is terminated or when an injury or illness has occurred temporarily impairing the individual's ability to perform the task.

Approvals which have been suspended under the circumstances given above may be re-instated when the cause for suspension is corrected and the correction verified by the employer, provided a period of 12 months has not elapsed.

Where the lapsed period exceeds 12 months, then the approval shall only be re-instated when an exam has been taken.

Comment

Without a Written Practice I believe that it is impossible for an employer to appreciate all that is necessary for monitoring an Authority to Work.

In practice, I suspect that there are many Certificate holders who, for whatever reason, have not returned their certificates for 'invalidation'. Clearly NDT operators holding 6 approvals and more cannot maintain the validity of certification as described above.

Also, I am aware that if the new ISO 9712 is approved, then some operators may never have to take an examination again after their initial approval - but how many would invalidate themselves if they were unable to work for a significant time.

Conclusions

All these post certification terms should be defined in the Written Practice.

The Employer must appreciate that his Authority to Work does not just last 3 or 5 years; there are validity clauses to be administered as well.

Employers must withdraw certification when NDT personnel do not meet with the specified document requirements.