



## Introduction

I believe that every Company who employs persons to carry out non-destructive testing should have a Written Practice within their Quality System. This month's article explains why and considers the requirements for creating an appropriate Written Practice. (For document references see Article 1 Jan 2002.)

## What is the Written Practice?

This is the name given – sometimes called a Written Procedure – to the document which describes the way in which the employer manages its training, examination and certification programme.

If you have NDT personnel who you wish to be qualified within the following systems then you MUST have a Written Practice:

- a) SNT-TC-1A<sup>1</sup>
- b) CP 189<sup>2</sup>
- c) EN 4179<sup>3</sup>
- d) NAS 410<sup>4</sup>

The reason why you MUST have a Written Practice is because it says you must in each of the documents:

- a) SNT-TC-1A (2001) '5:1 The employer shall establish a Written Practice for the control and administration of NDT personnel training, examination and certification.'
- b) ANSI/ASNT CP-189:2001 '5:1 The employer shall develop and maintain a procedure detailing the program that will be used for qualification and certification of NDT personnel in accordance with this standard.'
- c) EN 4179: 2000 '4.1.1 All employers involved in any aspect of NDT shall develop and maintain a procedure for the qualification and approval of their NDT personnel. This procedure shall be in accordance with the requirements of this standard.'
- d) NAS 410:96 '4.1 Cognizant NDT organisations shall develop and maintain a procedure for the qualification and certification of their NDT personnel. This procedure shall be in accordance with the requirements of this standard.'

You cannot have valid certification of your NDT personnel to any of the above documents without a Written Practice.

So why did I say all NDT employers should have a Written Practice? – well, this is what it says in EN 473:

'5.2.4 Employer – The employer shall ... and document the validity of the personal information provided, including the declaration of education, training and experience required for the eligibility of the candidate ... the employer shall be responsible for:

- a) issuing the operating authorisation.'

## Definition

3.10 operating authorisation – written statement issued by the employer based on the individual's competence as specified by the certificate. In addition to the certification, amongst other factors, the job-specific knowledge, skill and physical ability should be assessed for the specific task'

(please also be aware of '3.9 employer-organisation for which the candidate works on a regular basis; an employee can also be a candidate at the same time.')

My opinion is that the employer of EN 473 (PCN) certificated persons needs a Written Procedure within which the operating authorisation is clearly defined. However, here is one further justification – if the employer has a Quality System to BSEN ISO 9001:2000<sup>5</sup> then he surely must have a Written Practice:

As it says at '6.2 Human Resources. General – Persons performing work affecting product quality should be on the basis of appropriate education, training, skills and experience.'

Clearly a Quality Company working to this standard must cover these items in a Written Procedure.

So that's it – if you employ NDT personnel you need a Written Practice/ Procedure within which your Company authorises the NDT personnel to carry out the NDT techniques for which they are certificated.

#### *What is in the Written Practice?*

The following items should be considered – those marked with an asterisk\* will be described in greater detail in future articles:

- a) Scope – what documents the Written Practice is covering.
- b) Definitions – self explanatory.
- c) Methods – MT; PT; RT and so on – here is where employer-specific requirements would be introduced; for example Radiographic Interpretation of Welds – dense metal only.
- d) Levels of Qualification\*
- e) Qualification Requirements\*
  - e.1 Training; Education; Syllabus Requirements; Recommended Reading\*
  - e.2 Work experience\*
  - e.3 Examinations\*
    - e.3.1 Vision
    - e.3.2 General, Specific and Practical tests at each level.
  - e.4 Certification\*
  - e.5 Expiration; Suspension; Revocation; Recertification\*
  - e.6 Record keeping for audit purposes.

Once in place it is proposed that the Written Practice would be approved by the Company Level 3 although this is not a requirement in any document referenced except the 2001 edition of SNT-TC-1A. In this respect I ask you to consider who is your Level 3. Many companies will employ a Level 3 who will have been examined most likely into a central certification programme to EN 473 (PCN) or the ASNT NDT Level 3 programme. Alternatively the NDT Level 3 could be examined to the Company Level 3 exam as described in the Written Practice, but there are many other companies who simply do not have a Company Level 3.

If you use one organisation to provide training and/or exams this does not make them your Company Level 3. It is my opinion that an individual will only become a Company Level 3 when personally contracted to do so under a document agreed and signed by both parties. This then answers one question from the January Article. What about the other question? Well it is simple – a Level 3 cannot carry out a valid exam on any operator within the SNT system without working within a Written Practice – to do so is at best a) to show a lack of understanding of the system and b) to misuse the system.

### **Conclusion**

All NDT operators should be authorised to work within a Company Written Practice.

### **References**

Items 1 – 4 are referenced in the January 2002 article (Article 1).

BSEN ISO 9001: 2000 Quality Management Systems – Requirement.