



Introduction

In January 2002 we reviewed the current status of the NDT Certification Programme documents; I am pleased to report that to date there have been no further changes. All reference to documents in this Article relate to the January 2002 article.

In February I made the case for every employer of NDT operators to hold a Written Practice, which would be part of the Company Quality System describing exactly how the Company authorises its operators to carry out NDT.

We now consider the responsibility of the major players in the implementation of the Written Practice – the Employer and the Level 3.

Definition and Duties

Generally, the definition of the Employer is along the lines of (SNT-TC-1A): 'The corporate, private or public entity, which employs personnel for wages, salary, fees or other consideration'. Alternatively (PCN Gen 2000) states: 'Employer – The Organisation for which a candidate or holder of certificate works on a regular basis; an employer may be a candidate at the same time'.

SNT-TC-1A states 'The Employer shall establish a Written Practice for the control and administration of NDT personnel training, examination and certification.' and that 'Certification of all levels of NDT personnel is the responsibility of the Employer.'

PCN says of the Employer, that he shall:

- a. introduce the candidate to the Authorised Qualifying Body; (Test Centre)
- b. document the validity of the personal information provided, including the declaration of education, training and experience required for the eligibility of the candidate;
- c. not be directly involved in the qualification examination;
- d. with regard to certificated persons, the employer shall be responsible for:
 - i) issuing the operating authorisation *(see note below)
 - ii) verification of visual acuity in accordance with PSL/44, and
 - iii) verification of continuity in the application of the NDT method without significant interruption.
- e. Candidates for PCN Certification may be self employed or even unemployed so long as they provide documentary evidence that experience has been gained under the supervision of suitably qualified personnel.
- f. Candidates : A self-employed candidate shall assume all of the responsibilities described for the employer.

*Note: 'Operating authorisation' (PCN Gen 2000). A written statement issued by the Company based on the individual's competence as specified by the Certificate. In addition to the Certificate, amongst other factors, the job-specific knowledge, skill and physical ability should be assessed for the specific task.

Concerning the Level 3:

SNT-TC-1A states: 'An NDT Level III individual should be capable of developing, qualifying, and approving procedures, establishing and approving techniques, interpreting codes, standards, specifications and procedures; and designating the particular NDT methods, techniques and procedures to be used. The NDT Level III should be responsible for the NDT operations for which qualified and assigned and should be capable of interpreting and evaluating results in terms of existing codes, standards and specifications. The NDT Level III should have sufficient practical background in applicable materials, fabrication and product technology to establish techniques and to assist in establishing acceptance criteria when none are otherwise available. The NDT Level III should have general familiarity with other appropriate NDT methods, as demonstrated by an ASNT Level III Basic examination or other means. The NDT Level III, in the methods in which certified, should be capable of training and examining NDT Level I and II personnel for certification in those methods'.

Compare this with the PCN definition:

- a. *Level 3 personnel are qualified to direct any NDT operation for which they are certificated and:*
 - i) assume full responsibility for a test facility or examination centre and staff;
 - ii) establish and validate NDT instructions and procedures;
 - iii) interpret codes, standards, specifications and procedures;
 - iv) designate the particular test methods, techniques and procedures to be used;
 - v) within the scope and limitations of any PCN certification held, carry out all level 1 and level 2 duties, and supervise trainees and level 1 and 2 personnel.

- b. *Level 3 personnel have demonstrated:*
 - i) a competence to interpret and evaluate test results in terms of existing codes, standards and specifications;
 - ii) possession of the required level of knowledge in applicable materials, fabrication and product technology sufficient to enable the selection of NDT methods and techniques, and to assist in the establishment of test criteria where none are otherwise available;
 - iii) a general familiarity with other NDT methods;
 - iv) the ability to guide personnel below Level 3.
 - v) Level 3 certificated personnel may be authorised to carry out, manage and supervise PCN qualification examinations on behalf of the British Institute of NDT.
 - vi) Where Level 3 duties require the individual to apply routine NDT by a method or methods, because the level 3 certificate holder demonstrates practical competence only at initial certification, the British Institute of NDT strongly recommends that industry demand that this person should hold and maintain Level 2 certification in those methods.

Is there a clear link between the Employer and the Level 3? I believe this is clarified in SNT-TC-1A as follows:

'At the option of the Employer, an outside agency may be engaged to provide NDT Level III services. In such instances, the responsibility of certification of the employees shall be retained by the employer.'

What does all this mean – well my interpretation is as follows: for PCN - the Employer need not have a Written Practice (or an NDT Level 3) and is not allowed to be directly involved in the qualification exam but must accept the responsibility for the issue of the operating authorisation to the NDT Technician (including the Level 3).

For SNT-TC-1A – the Employer must have a Written Practice which will be approved by an NDT Level 3 and through this document ensure that the qualification requirements are met appropriately to allow the Employer to certify the NDT operators.

This is covered in SNT-TC-1A under two definitions as follows:

- a. *Certifying agency*: the employer of the personnel being certified.
- b. *Certifying authority*: the person or persons properly designated in the written practice to sign certifications on behalf of the employer.

So within the Written Practice we specify that the Personnel Certification records, to be retained on file, shall be the signed by the Employer's designated person, and this person (the certifying authority) shall be named in the Written Practice.

The Employer (Certifying Agency) must be able to draw on the experience of a properly designated person who may be the Company Level 3, who has demonstrated knowledge of that Company's requirements. It must be based on appropriate demonstrated experience, because the 'Employer' will be putting his trust in this person.

So there it is – surprisingly, both Employer based and Central Certification programmes come very close on the issues discussed in Article 3.

Conclusions

1. Both systems require that the 'Employer' takes responsibility for the authority to operate.
2. This authority to operate is a PCN definition; in SNT-TC-1A it is the Certifying Authority but essentially they mean the same – an appropriately designated representative of the Company to sign on behalf of the Employer, who is named in the Written Practice.
3. The SNT system requires that this person is properly designated within a Company Written Practice – the PCN system does not cover this.
4. Neither system makes any demands on the eligibility requirement for a 'properly designated person'.
5. All these points constitute further reasons why an employer of NDT personnel must have a Written Practice which clearly defines the Company's position with respect to Training, Work Experience, Exams and certificate to operate signed by an appropriately designated person.