



ALL CONFORMITY ASSESSMENT BODIES  
(APPLICANT AND NOTIFIED)  
UNDER PRESSURE EQUIPMENT REGULATIONS

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Dear Colleagues

PRESSURE EQUIPMENT REGULATIONS 1999 (PER) – SCHEDULE 2 para.3 3.1.3  
(APPROVAL OF PERSONNEL FOR NON-DESTRUCTIVE TESTING, 'NDT')

On 30 November 2000 my predecessor, Claire Chaubert, wrote to you on this subject. In the course of her letter she outlined her concern that the Guidelines which the Department had adopted and published for the appointment of conformity bodies under the PER (URN 99/1051) were not entirely suitable in respect of approval by Recognised Third Party Organisations ('RTPOs') of NDT. She therefore advised that they should be disregarded pending their amendment following consultation.

The purpose of this letter is to make clear, following a review and discussion of the situation by all interested parties, that the guidelines remain valid as published. In addition, I would like to draw your attention to the final version of a Memorandum for UK bodies accredited for NDT testing which has also resulted from these discussions and which should bring more clarity and flexibility to the overall situation. This Memorandum is attached and is now available for use where appropriate by UKAS in assessing RTPOs which approve NDT personnel.

It may be helpful to summarise briefly the underlying law. Article 13.1 of the directive requires member States to notify the Commission and other member States of the RTPOs which they have recognised for the purposes of the tasks referred to in Annex 1, sections 3.1.2. and 3.1.3. These paragraphs deal respectively with permanent joining and NDT. For the latter paragraph 3.1.3 states that NDTs of permanent joints must be carried out by "suitable (for which read 'suitably') qualified personnel". It goes on to say that "for pressure equipment in categories III and IV, the personnel must be approved by a third-party organisation recognised by a member State pursuant to Article 13". Article 13.2 states that the criteria for the recognition of such



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organisations are those set out in Annex IV and that an organisation which meets the criteria laid down in the relevant harmonised standard shall be presumed to fulfil the corresponding criteria in Annex IV. These provisions have been implemented in the PER through regulations 19 and 20.

The situation has been reflected in paragraph 3.7 of URN 99/1051 by the citation of EN 45013 as the *basic* standard for assessing the suitability, by UKAS in the first instance, of applicants for NDT testing. This in turn gave rise to concerns that RTPOs may not, accordingly, be able to approve NDT personnel qualified through manufacturers' in-house systems. In the light of the non-prescriptive nature of the directive here – nowhere in the PED (and thus in the PER) is there any indication of the standards that *must* be used by the RTPO for these approvals – it was believed that this was too restrictive an approach and that there should be room for such approvals to be made, where appropriate, within the overall implementation of the directive.

After further consideration and enquiries, however, it has become apparent that the Guidelines, supplemented where necessary by the Memorandum, should not be amended and that 'in-house qualification of NDT personnel' can be accommodated within a framework of UKAS continuing to use EN 45013 as its basic standard for assessing applicants with the added flexibility given by the Memorandum. This approach is, it should finally be noted, consistent with that adopted in all of the other EU member States who responded to our enquiries.

URN 99/1051 will be updated in due course to incorporate a small revision to the existing paragraph 3.7 noting the availability of the ACOP as well as to take account of a few developments on other aspects of the accreditation process.

If you have any queries on this please let me know. I am copying this letter to David Evans at UKAS and Paul Murphy at HSE. I hope that this complicated matter has now been resolved with the required clarity and I am sorry for the uncertainty which has surrounded it to date.

Yours sincerely

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# UNITED KINGDOM CONFORMITY ASSESSMENT BODIES

## UKAS/DTI MEMORANDUM IN RESPECT OF THE ASSESSMENT OF RTPOs FOR APPROVAL OF NON-DESTRUCTIVE TESTING

1. RECOGNISED THIRD PARTY ORGANISATIONS (RTPO)
  - 1.1. RTPO will satisfy the criteria of 97/23/EC Annex IV
  - 1.2. RTPO will carry out an audit of NDT personnel qualification systems in accordance with this Memorandum in order to assess the competence of personnel to carry out non-destructive testing of permanent joints in pressure equipment.
2. RTPO AUDIT PERSONNEL
  - 2.1. The RTPO shall appoint personnel with relevant qualifications and experience to carry out technical and quality system audits in the process of 'approving' NDT personnel under the provisions of section 3.1.3 of Schedule 2 to the Pressure Equipment Regulations.
  - 2.2. The individuals (or the team) auditing NDT personnel and the qualification systems for such personnel, will hold (individually or between them as a team):
    - 2.2.1. current personnel certification, relevant to the NDT methods to be audited, and
    - 2.2.2. evidence of training, qualifications and experience in the conduct of audits, e.g., IRCA registration as assessor, lead assessor, or National Board of Boiler and Pressure Vessels Inspectors' supervisor inspector certification.
  - 2.3. RTPO shall adopt positive reporting for all audits.
3. PRE-AUDIT DOCUMENTATION
  - 3.1. The client applying for approval of NDT personnel shall provide for the preliminary information of the RTPO at least:
    - 3.1.1. A copy of the company procedure for qualification of NDT personnel, which shall satisfy the provisions of recognised criteria (i.e., from amongst references 1 to 6);
    - 3.1.2. A list of personnel carrying out NDT for whom RTPO approval is sought, including certificates of competence/authorisation;
    - 3.1.3. Information concerning the NDT procedures against which non-destructive testing is carried out.
4. AUDIT
  - 4.1. RTPO shall audit and report on the following (as a minimum):
    - 4.1.1. the compliance of the company procedure for qualification of NDT personnel with the applicable criteria, and the satisfactory implementation of the procedure;

- 4.1.2. the existence of satisfactory qualification records for all NDT personnel for whom approval is sought, including:
  - 4.1.2.1. evidence of success, in accordance with the criteria, in written general and specific examinations, and in specific practical examinations;
  - 4.1.2.2. evidence of satisfying the criteria in terms of eligibility for approval, including relevant training, experience and acuity of vision and relevant colour contrast perception;
- 4.1.3. suitable controlled NDT Procedures and NDT Instructions for the approved personnel to follow in the application of NDT to the pressure equipment and/or products to be tested;
- 4.1.4. the satisfactory application by the approved personnel of the NDT Instructions and Procedures (RTPO shall carry out a sample audit of not less than 20% or not less than one per NDT procedure) of the application of relevant NDT procedures by each approved person);
- 4.1.5. an effective procedure controlled within the organisation's quality management system for the on-the-job monitoring or surveillance of approved NDT personnel, and evidence that the procedure is correctly implemented;
- 4.1.6. satisfactory records for all of the above.

## 5. AUDIT RECORDS

- 5.1. Detail and Summary report forms shall be completed during and at the conclusion of the audit. The following minimum information shall be recorded:
  - 5.1.1. Organisation and date/type of assessment;
  - 5.1.2. Team members and qualifications;
  - 5.1.3. The client's senior representative (and position) in attendance;
  - 5.1.4. Written Practice maturity e.g. start date, revision history and any recent significant changes;
  - 5.1.5. Significant areas where the internal procedure for qualification of NDT personnel and any supporting NDT procedures work well;
  - 5.1.6. Summary of overall effectiveness of the Written Practice, highlighting strengths and weaknesses, including a report on the audit elements detailed above (under AUDIT);
  - 5.1.7. Name(s) and qualifications of the employer's qualified person or persons responsible for surveillance of NDT personnel;
  - 5.1.8. A recommendation to the RTPO concerning each of the NDT personnel offered for approval, including:
    - 5.1.8.1. the scope of approvals recommended and
    - 5.1.8.2. the applicable NDT Instructions and/or NDT Procedures for which each NDT technician is to be approved.

5.2. Full audit records shall be retained by the RTPO for the duration of the approvals and for a minimum of 7 years beyond the date of expiry of the approval.

## 6. APPROVALS

6.1. The RTPO shall issue documented approvals with a period of validity of not more than three years from the date of the audit.

6.2. Additional NDT personnel qualified within the system which has been subject to RTPO audit may subsequently be approved by the RTPO on the basis of a desk-top review of the documentary evidence specified in clause 4.1.2.

6.3. All NDT personnel approvals shall be conditional upon:

6.3.1. the individual's qualification and certification/authorisation, issued by the employer, remaining valid;

6.3.2. receipt by the RTPO at not less than 12 monthly intervals of evidence of satisfactory surveillance of approved NDT personnel carried out by a person or persons, whose appointment for the purpose is agreed between the RTPO and the Employer (the Employer shall consult with the RTPO prior to changes in persons undertaking surveillance);

6.4. Upon or before expiry of the approvals, the RTPO shall carry out a further full site audit to confirm satisfactory arrangements to verify the continuing competence of the approved NDT personnel.

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## REFERENCES

1. ISO 11484 1994 Steel tubes for pressure purposes - qualification and certification of non-destructive testing (NDT) personnel
2. EN 10256 2000 Non-destructive testing of steel tubes - qualification and competence of level 1 and 2 non-destructive testing personnel
3. ANSI-CP-189 ANSI/ASNT standard for qualification and certification of non-destructive testing personnel
4. AIA-NAS-410 Aerospace Industries Association national Aerospace Standard for qualification and certification of non-destructive testing personnel
5. SNT-TC-1A ASNT recommended practice for the qualification and certification of non-destructive testing personnel (Periodically reviewed and republished by the American Society for NDT)
6. EN 4179 2000 Aerospace series - qualification and approval of personnel for non-destructive testing
7. EN 473 2000 Qualification and certification of NDT personnel - General Principles.

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**22 JANUARY 2002**

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