

ANSI/ASNT CP-189 Inquiries

ANSI/ASNT CP-189: Standard for Qualification and Certification of Nondestructive Testing Personnel was developed and coordinated using American National Standards Institute (ANSI) approved consensus procedures. The ASNT Standards Development Committee is the official body within ASNT charged by ANSI with developing written responses and interpretations to inquiries. These responses clarify the intent of *ANSI/ASNT CP-189*.

Inquiry 12-01

Withdrawn

Inquiry 12-02

Will ANSI/ASNT CP-189 accept and recognize certification of nondestructive testing (NDT) personnel issued by ISO 9712 or EN 473 schemes? Under which conditions and terms?

Background

Requests for clarification have arisen from many countries that would use these international standards as well as CP-189.

Response

No, as an ANSI standard, all requirements of the standard must be met, including paragraph 2.2.1, which states, “NDT Level III. An individual possessing a currently valid ASNT or PdM Level III certificate (see 10.1.3) or ACCP Professional Level III certificate (see 10.1.4) and certified in accordance with this standard. (See also Section 3).” Reference to ASNT NDT Level III throughout this standard implies the individual holds one of these certificates.

Inquiry 11-01

The State of California, Department of General Services, Division of the State Architect has jurisdiction over construction of schools and other state-owned buildings. They are now requiring a Licensed Civil Engineer to sign off on all of our firm’s nondestructive testing (NDT) certification documents. We feel this is an unnecessary level of bureaucracy, as per *CP-189*, and the ASNT NDT Level III is the certifying authority, and he administers the tests and signs the certifications. Is the State’s requirement in conformance with *CP-189*, and would it not require a formal revision to *ANSI/ASNT CP-189*?

Background

See Division of State Architect *IR 17-2* and samples of our Certification Documents. Consolidated Engineering Labs is a fully accredited facility, meeting ASTM Standards *E-543-04* and *E-1212-04*. Our Qualification and Certification Procedure has been *CP-189* compliant since 2004; it is only since early 2011 that the Division of the State Architect has attempted to enforce the engineer signature provision. All other California state, county and municipal jurisdictions accept *ASNT Recommended Practice No. SNT-TC-1A: Personnel Qualification and Certification in Nondestructive Testing*.

Response

There is no need for a formal revision. Paragraph 9.2/9.2.1.5 does not prohibit the customer from adding requirements.

Inquiry 10-07

It is intents of paragraph 9.2 Contents of Documentation. The employer's certification documentation shall include at least a training record, certification record, an experience record, a record of previous experience (if applicable), employee's current examinations and a vision examination record. That all "training record, certification record, an experience record, a record of previous experience (if applicable), employee's current examinations, and a vision examination record" should be kept in one file for each individual?

Response

No, a filing system is not specified in this standard.

Inquiry 10-06

Improperly formatted request.

Inquiry 10-05

CP-189 paragraph 6.2. requires NDT Level III examinations administered by the employer as follows:

1. Specific exam: written exam on NDT-related requirements of specs or standards used by the employer, e.g. ASME codes.
2. Practical exam which requires that the candidate should prepare an NDT procedure (If the documented experience demonstrates that the candidate has previously prepared acceptable procedures using specs and requirements of codes applicable to employer, a practical exam is not required).

Is it required from ACCP Professional Level III anyway to undergo the exams mentioned above?

Response

Yes.

Inquiry 10-04

Improperly formatted request.

Inquiry 10-03

Improperly formatted request.

Inquiry 10-02

Can the eye examination for near vision given in the middle or beginning of a month expire at the end of that same month 1 year later?

Example: If an eye examination for near vision is conducted on Dec. 15th of 2009, can the expiration date be Dec. 31st 2010.

Response

The term "date" used to establish intervals, such as "annual" in ASNT personnel qualification and certification documents is intended to be the last day of the applicable month.

Inquiry 10-01

4.1.3 states “All training shall be presented by an NDT instructor”. 4.4.1.1 states “possess a current ASNT Level III certificate in the NDT method to be taught.

Does it imply that if an employer has a NDT Level III in direct employment he does not require an NDT instructor to present training, since the employers Level III has met the requirement of 4.4.1.1?

Response

Yes, paragraph 4.4.1.1 provides that individuals that possess a current ASNT Level III certificate in the NDT method to be taught, meet the criteria as an NDT Instructor. References to an ASNT Level III certificate in *ANSI/ASNT CP-189* applies to individuals holding either (or all) Level III certificates issued by ASNT, i.e. ASNT NDT Level III, ASNT PdM Level III or ACCP Professional Level III.

Inquiry 9-05

Appendix C: Sample certification Form has a section to document education, including High School or equivalent. However, the pertinent sections of the document reflect no requirement for education or documentation of such (except for instructors). Suggest reflecting the requirements as needed to accommodate this aspect of qualification.

Response

The individual candidates level of formal education is not a factor in the requirements for qualification and certification of NDT personnel in accordance with *ANSI/ASNT CP-189* standards.

Inquiry 9-04

Can an ASNT Level III that is not certified in the applicable test method administer a multiple- choice Specific written examination to another Level III in that test method if he is designated by the employer as the certifying representative and that designation is documented in the company's Certification procedure?

Response

No, *ANSI/ASNT CP-189-1995* paragraph 6.4.1 permits delegation of administration and grading of multiple-choice questions for NDT Level I and NDT Level II candidates, if so documented.

6.7 takes precedence which states, “The employer’s representative who administers the Level III examinations shall possess a current ASNT NDT Level III certificate in the method for which the examination is administered and shall be knowledgeable and familiar with the standards, specifications, and products used or made by the employer.”

Inquiry 9-03

1. Is it the intent of *CP-189* that the development of the qualification examinations described in Sections 6.2 & 6.3 be done by an ASNT Level III certified in the applicable test method?

2. If the answer to (1) above is No, must those examinations be approved by a Level III, and if so, must the Level III be certified in the applicable test method?

Response

1. Yes, *ANSI/CP-189-1995* paragraph 6.4.1 states, in part, "...The employer shall be responsible for having an individual possessing a current ASNT NDT Level III certificate develop, administer, and grade Level III specific and practical examinations.

Inquiry 9-02

1. Is it the intent of Paragraph 6.3.3(b) that when a candidate is performing a Level II practical examination and the candidate's certification will be limited to a technique (e.g. limited to dry powder yoke magnetic particle) that only one sample needs to be used in administration of the practical examination.
2. Is it the intent of Paragraph 6.2.4 that when a candidate is certifying to *CP-189* from previous uninterrupted service as a Level III per *SNT-TC-1A* that a Level II is required to perform the demonstration examination per the Level II practical examination rules even if the Level II has performed a Level II practical examination during *SNT-TC-1A* certification?

Response

1. No, paragraph 6.3.3.(b) states in part, "Level II. The candidate shall demonstrate proficiency...a minimum of two samples per method..."
2. No, paragraph 6.2.4 states in part. "...The practical examination shall include demonstrations of candidates ability to perform required activity (ies)." Documented evidence of the candidates ability to perform required activity(ies) satisfies this requirement.

Inquiry 09-01

CP-189 addresses the initial on-the-job training requirements. Are we to assume that the hours required for each method must be met during each certification cycle? Example: PT requires 140 h in the method and 270 h total in NDT for the Level II. Considering that these hours are required for Initial certification, must we meet the same requirements each time we recertify?

Response

No. The training hours shown in Appendix A are for initial certification. Recertification requirements are addressed in Section 8.0.

Inquiry 08-01

Is the requirement and/or intent of paragraph 4.3.2 that if an individual holds a current ASNT NDT Level III, the backup documentation including training and experience records need not be reviewed or retained by the employer to certify an individual in accordance with *CP-189*?

Response

Backup documentation including training and experience records is not required. *CP-189* paragraph 9.2.1.3, Certification Record, states, "For Level III personnel, a copy of the candidate's ASNT Level III certificate." See also Inquiry 03-2.

Inquiry 07-05

Does this statement (paragraph 2.2.2) imply that the certificate holder (PdM) can perform the actions in 3.2 (General familiarity because of Basic Examination) and 5.3 for all methods not just IR and VA?

Response

No, only the methods for which the Level III is qualified as stated in paragraph 3.2.

Inquiry 07-04

If the employer does not have NDT personnel, but have PdM personnel, is it the intent of this document that there is still a need for a procedure for certification.

Response

Yes, if the employer must certify PdM personnel in accordance with CP-189.

Inquiry 07-03

The Predictive Maintenance (PdM) individual is identified in two paragraphs in this document Scope 1.1, and NDT Levels 2.2.1, with no clear understanding who this individual is. In 1.1 the scope of this standard is to establish the minimum requirements for the qualification and certification of the PdM. This does not exist in this standard. Is it the intent of this document to address PdM personnel qualification and certification requirements.

Response

Yes, for Level I and Level II personnel, see paragraph 4.1.1, Table 1 and Appendix A.

Inquiry 07-02

Is it the intent to allow Limited Certifications other than UT and RT film interpretation? This is not defined in the document. Both paragraphs 3.4 and 4.2.2 reference, Appendix B of this document, which is specific to RT and UT.

Response

No, however, for methods other than those in Appendix B, limited certification may be used as long as the employer's written procedure meets the minimum qualification requirements of CP-189.

Inquiry 07-01

Can an ASNT Level III not certified in a particular method sign certification of personnel in that particular method, if he is designated by the employer as the certifying representative?

Response

Yes, provided the requirements for the certifying representative are covered in the procedure for qualifying personnel.

Inquiry 06-4

1. Does *CP-189-2001* require the ASNT Level III approving an employer's written procedure for personnel certification to be certified in the specific methods addressed by that written procedure?
2. Does *CP-189-2001* require the ASNT Level III administering a facility's NDT program to be ASNT Level III certified in all NDT test methods performed by the facility?

Response

1. No
2. No

An NDT Level III for *ANSI/ASNT CP-189* is any valid ASNT NDT Level III certificate holder. Specific method certification requirements are described in the document where applicable. As an example, practical examinations must be administered by an NDT Level III certified in the applicable method to ensure credibility in assessing satisfactory performance.

Inquiry 06-1

An NDT Level III possesses a current ASNT NDT Level III in RT, PT, UT, MT, and VT and ACCP Level III in RT, PT, UT, MT, and VT with documented evidence of experience including the preparation of NDT procedures to codes, standards or specifications and the evaluation of test results. Is it necessary that the employer shall qualify him by specific examination for RT, PT, UT, MT, and VT?

Response

Yes, paragraph 6.2.2 requires that the employer administer the specific examination (for each method in which certification is sought). The written examination shall consist of at least thirty questions.

Inquiry 05-4

1. What initial training and experience requirements should be used for Level Is and IIs in the Laser Method (LM) Shearography? (Appendix A)
2. Lacking the above guidance, does Paragraph 4.1 permit the employers' NDT Level III to determine these requirements provided they are documented in their written procedures?

Response

Since ASNT does not provide an NDT Level III certificate in Laser Shearography, qualification and certification in this method cannot be performed in accordance with *CP-189*.

Inquiry 05-3

Can an ASNT PdM Level III administer qualification exams under *CP-189*?

Response

Yes, provided the PdM Level III certificate is in a method addressed by *CP-189*.

Inquiry 05-2

If included in our written practice, is it permissible to allow for the Level III examiner to extend a technician's certification for 30 days if extenuating circumstances prevent testing before the technician's certification expiration date?

Response

No. *CP-189* does not provide for extension of certifications.

Inquiry 05-1

If hours in a specific method for Level II certification takes several years to acquire, can NDT experience hours be used towards the specific method hours to fulfill experience requirements?

Response

No, the required experience must be met in the method in which certification is being pursued plus the additional NDT hours as specified in Appendix A. The additional hours required to fulfill the total NDT experience requirement may be gained in more than one (1) method. However, an individual is still required to meet the minimum method hours prior to being certified.

Inquiry 04-2

1. Where are the techniques defined, or to be defined, for each NDT method listed in *ANSI/ASNT CP-189*?
2. If an individual is not going to be performing all techniques of a Method, e.g., immersion UT but will be performing contact UT, would this be considered as a "limited" certification?
3. If so, where is this to be addressed?

Response

1. *CP-189* identifies the NDT methods only, techniques need to be defined within the employer's qualification and certification procedure.
2. Designating a limited certification must be defined in the employer's qualification and certification procedure.
3. Must be defined in the employer's qualification and certification procedure.

Inquiry 04-1

Does *CP-189* allow personnel other than the corporate Level III to act as the employers certifying representative?

Response

Yes — if the employer has developed a procedure in accordance with paragraph 5.2.e that defines who is responsible for documenting the certification. The employer's procedure must however be approved by an NDT Level III designated by the employer, as specified by paragraph 5.3.

Inquiry 03-2

Does an ASNT NDT Level III certified individual need to provide annual documentation of experience? This assumes that the individual performs hands-on testing and not just oversight duties. How does ASNT interpret experience for Level IIIs in order to be compliant to *CP-189*?

Response

No, the intent of *CP-189* was that experience requirements for ASNT NDT Level III certification would be satisfied if the individual held a current ASNT NDT Level III certificate in the specific NDT method.

Inquiry 03-1

Is it the intent of Appendix A that additional hours of experience in other NDT methods are required in addition to the minimum hours specified for each method prior to certification?

Response

The intent of Appendix A is to allow an individual to use experience hours gained in other methods towards the experience requirements of a specific method. However, Appendix A does not *require* experience in methods other than the method for which certification is sought. If an individual is seeking certification in one method with no experience in other methods, the experience hours needed to meet the requirements for certification under Appendix A would be the "Total Hours in NDT."

Inquiry 97-3

I currently certify about 120 inspectors in PT, MT, RT, UT and ET as Level I or II. I have developed checklists for practical exams in the methods I am certified Level III. We have Level IIs in our organization who have been delegated the responsibility of administering and grading written exams for our customers. Will we be in compliance with *CP-189* if we use these Level IIs to give practical to Level I and II candidates, assuming they use the checklists?

Response

No, per paragraph 6.4.1. The Level III must administer the practical examination per checklists as stated in paragraph 6.4.4 for Level I and paragraph 6.4.5 Level II.

Inquiry 97-2

There is some confusion as to what "administration" of a practical exam really means in paragraph 6.4.1 of *CP-189-1991*. Does a Level III have to be looking over the inspector's shoulder during a practical or not?

It seems contrary to the way practical exams are supervised in the ACCP program. From what I understand of the ACCP GHOP, the candidate is given the equipment, parts, and requirements and is left to inspect the parts with minimal supervision and is graded based upon results rather than precisely how the individual performed the inspection.

Response

Yes, per paragraph 6.4.1. The Level III must administer (develop, proctor, and grade) practical examination in the method for which he is qualified.

Inquiry 97-1

In accordance with *ANSI/ASNT CP-189-1995*; when a company does not have an NDT Level III on staff and elects to hire an outside organization to perform the duties of an NDT Level III, is the ASNT NDT Level III(s) of the engaged outside organization required to take the employer's Level III Specific Examination (for each method)? Section 6.2.2.

If an outside organization's ASNT NDT Level III(s) is required to take a company's Level III Specific and Practical Examinations, what authority will prepare and administer said tests on the company's behalf? Section 6.7.

Response

No, per paragraph 4.5. The employer is responsible for evaluation of the outside organization to assure the services provided are in accordance with the employer's certification procedure. The certification procedure should outline what the employer's requirements are for approving the outside organization.

Inquiry 96-1

Does *CP-189* allow limited certification in NDT methods if documented in the employer's written procedure.

Response

Yes. *ANSI/ASNT CP-189* ASNT Standard for Qualification and Certification of Nondestructive Testing Personnel allows limited certification in any NDT method as long as the employer's written procedure meets the minimum qualification requirements of *CP-189*.

Inquiry 95-1

When an outside organization is engaged to perform Level III duties, is that organization to provide the employer with copies of the exam for the employer's records?

Response

Yes. When an outside agency is engaged to provide Level III services for the employer they should provide copies of the examinations that they administered, provided that is their policy. Some companies only provide resulting grades of examinations, while others provide a pass/fail as a result. The employer's procedure on qualification should address these issues.

Questions and inquiries concerning the Standards Development Committee and *ANSI/ASNT CP-189 ASNT Standard for the Qualification and Certification of Nondestructive Testing Personnel* should be directed to:

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