#### UK National Aerospace NDT Board

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## UNCONFIRMED NOTES OF THE 50<sup>th</sup> MEETING OF THE UK NATIONAL AEROSPACE NDT BOARD

Meeting Date: Tuesday 10<sup>th</sup> March 2015, 10:00

Location: BINDT, Newton Building, St Georges Avenue, Northampton, NN2 6JB

## NANDTB/2015/M1

### 1. Confirmation of the agenda (and any other business)

J Biddulph (Chair) welcomed all to the meeting. There was a round table introduction for P Boulton who was attending his first meeting. J Biddulph thanked BINDT for having the meeting at such short notice at their offices.

Phil Berkley also introduced Stuart Wroot who will be taking over from Phil as he is retiring.

J Biddulph presented Phil Berkley with a certificate and thanked him for his contribution to the Aerospace Board over the years.

### 2. Attendance & apologies for absence (Annex A)

Refer to attached attendance sheet.

J Biddulph noted that we are quorate with 7 voting members.

### 3. Notes of the 49<sup>th</sup> meeting (distributed earlier)

#### a. Confirmation

We also went through who was in attendance and who was not as this appeared to be incorrect.

The minutes of the last meeting were confirmed.

## b. Review of allocated actions below with special mention to the following;

Ref	Actions brought forward	Remarks
06/2013	C Worrall (LEAD), G McCully, C Thomas, T Blacklay, S Algar to review NANDTB-18. Comments to be submitted to J Cook by close of business 5th April 2013 for implementation with approval at the next meeting.	<b>ON HOLD</b> Document update to be postponed until publication of new issue EN 4179
24/2013	<u>All</u> members to send suggestions to <b>K Phillips</b> for collation, on 'what the UK NANDTB wants the forum to achieve'. Suggestions to be put to T Blacklay at a meeting between UK NANDTB and CAA at Aviation House TBC. (action re-allocated to KP from JB)	<b>ON HOLD</b> No suggestions received from members
39/2013	T Blacklay to formally correspond with Primes' employers advising why it is important that members of UK NANDTB attend and witness audits of Aerospace agencies/training & examination centres.	<b>OVERDUE –</b> Transfer to Stuart Algar, Stuart confirmed this would be done by next meeting.
02/2014 Amended	N Scutt to circulate the BINDT auditor training criteria	<b>OVERDUE</b> – NLS confirmed that she would have something to table at the next meeting. NLS confirmed that we are revising all of the auditor documentation so this will be tabled in February meeting.
16/2014	NANDTB_15 – review by;	ONGOING
	C Dootson and A Williams	On agenda

21/2014	J Biddulph and N Scutt to co-ordinate expediting the transfer of ANDTBF information and documentation to be included on BINDT website	CLOSED
23/2014	J Biddulph to create an advisory and organisation chart showing the Board has signed up to ANDTBF_08 recognition of approvals and removing the overseas affiliations process.	<b>OVERDUE</b> – Jon Biddulph confirmed that we are going to cancel affiliation so this should be removed
25/2014	NANDTB_21 to be redrafted by the Affiliation WG Including AD008, TB to write a letter to EASA informing them of the Boards position.	<b>ONGOING –</b> On agenda We need to reissue this document as withdrawn and write a letter to the organisations affiliated telling them that they are no longer affiliated
26/2014	CT To take checklist/work instruction on marking procedures to OA/IA user group.	ONGOING – This was taking to the OA/IA Group and they were happy and this needs to be issued by the OA/IA Group. Action 50/2014 – CT to issue and to be mandated from 1/1/2015
27/2014	TG to reconfirm CW membership status.	CLOSED
28/2014	JB, TB, KP to review NANDTB 04	ONGOING
29/2014	G McCully, CT, JB, TB to review NANDTB 10	<b>CLOSED –</b> CT informed the board that the re-issue this did impact of GR23 but they did take the wording of GR23 and put it in NANDTB10 – JB signed this off.
35/2014	TG to withdraw AD003 & AD005 when revised EN4179 published.	CLOSED
36/2014	TG to withdraw AD 007 & AD 008 when Actions 25/2014 & 32/2014 have been closed.	CLOSED
41/2014	J Dugard, M Cox, J Biddulph and T Blacklay to look at NANDTB_23	ONGOING – on agenda
44/2014	TG to issue IA checklist as OAQS8 if no comments received.	<b>ONGOING –</b> NLS asked Graham McCully to send us the final draft, we would circulate this out for comment and then if nothing comes back we will issue it.
46/2014	T Blacklay to make amendments to GR23 and publish	CLOSED
49/2014	CW & JD to review NANDTB_17 and circulate	CLOSED – Published
50/2014	CT to issue and to be mandated from 1/1/2015	CLOSED - Published
51/2014	SA to discuss with TB and report	CLOSED
52/2014	TG to issue NANDTB 17 and upload	CLOSED
53/2014	NLS and JB to create a letter to be sent out regarding affiliations	CLOSED
54/2014	NLS to send an email to the Board informing when matrix uploaded	CLOSED
55/2014	NLS to send the link to SA to ANDTBF_08	CLOSED
56/2014	TG to resend document to all members	ONGOING
57/2014	TB to revise the draft and SA will take out comments back to TB	CLOSED
58/2014	OA/IA Group to review the following NANDTB documents, NANDTB_10, 12, 14, 16, 19, 22, 25 & AD007.	CLOSED
60/2014	BS to provide CT with the AIA document	CLOSED

#### c. Other matters arising (not covered by the agenda)

No other matters arising.

#### 4. Membership (current list)

- a. Phil Berkley stated that Stuart Wroot will need a nomination letter.
- **b.** We need a reconfirmation that Alan Williams from Airbus is still on the Board.

#### 5. Documents for discussion and/or approval

a. NANDTB\_02, NANDTB\_03, NANDTB\_04 – (Jon Biddulph, Ted Blacklay & Keith Phillips)

KP confirmed that having looked through the three document on NANDTB\_02 there is one line in there that say "does permit affiliations" which needs to be part of the whole review process.

These documents being discussed in great length and being amended in real time.

b. NANDTB\_09 & NANDTB\_15 – (Chris Dootson & Alun Williams)

Action 01/2015 – CD to recirculate these documents

c. NANDTB\_10, NANDTB\_12, NANDTB\_14, NANDTB\_16, NANDTB\_19, NANDTB\_22 & NANDTB\_25 (Dave Griffin)

DG advised that these documents had been reviewed via email as there was no time at the meeting.

**NANDTB\_10** a question asked was "why is this only applicable to Part 145 organisations and why exclude Part 21 organisation?" GMcC confirmed that NANDTB\_10 was updated last year. However it was noted that this was still waiting to be reviewed.

NANTDB\_10 also has the old logo on.

#### Action 02/2015 – JB and GMcC to review this document

**NANDTB\_12** being discussed regarding the PCN/Aero and paragraph 3.14. Question asked was "if you read paragraph 3.14 with NANDTB\_10 would this mean that the L3 would only be able to make it applicable to Part 145 operators?"

A lengthy discussion took place and this needs to be reviewed and changed.

Action 03/2015 - JB, GMcC and CT to review this document

**NANDTB\_14** being discussed regarding and JD noted that under the new standard shearography is not an emerging method and so is thermography and CR. Question was asked 3.5 "L2 limited is only permitted for new or emerging methods. Somebody was questioned by a European L3 who intended to use L2 limited for EC. The answer to this is in NANDTB\_17.

This was amended in real time.

NANDTB\_16 – this document has already been amended. It was issued in November.

**NANDTB\_19** – a WG headed up by CD, GMcC, JD and KPU and they did find some changes which CD has been tasking with doing. Somebody asked whether or not this document is needed.

Action 04/2015 - CD and KPU to amend NANDTB\_19 in accordance with comments received

**NANDTB\_22** - this was reviewed in November and reissued so no changes necessary.

NANDTB\_24 and NANDTB\_25 - these documents need to be reviewed together.

Action 05/2015 – DG to contact Andy Bakewell regarding the updated on ISO 18490

Action 06/2015 – JB to send pp to DG and to CT as he has amended Rolls Royce version

**AD007** - also confirmed that some work had been done on AD007 but noted earlier it had been removed even though it was amended in November last year. AD007 should be incorporated into NANDTB\_16.

Action 07/2015 – JB to incorporate put the advisory AD007 at the beginning of NANDTB\_16

**NANDTB\_21** – has been withdrawn.

Action 08/2015 – JB to put something on the website re NANDTB\_21 being withdrawn

**NANDTB\_23** – **Paragraphs 2.1, 3.2, 3.2.2, 3.2.3, 3.3 and 3.4** - JB confirmed that this came up at the Portsmouth meeting and that we were having a discussion about the RL3. The RL3 needs to be internally and externally qualified, it was suggested that we put that in NANDTB\_23 however this document relates to recertification as a L3 using the credit system. This document was discussed regarding NAS410, EN4179 and PCN Aero and how it complies and it was noted that this needed to be updated.

# Action 09/2015 – JB, MC and JD to re-draft NANDTB\_23 to include certification and re-certification

**PREN4179/NAS410** – JB confirmed that it is now up to us to decide whether we will consider this new revision. KP asked if there was a compliance date for PREN4179 and JB confirmed that it is 6 months. We therefore need to decide on the transition period. DG confirmed that a six month transition period would be good however if we do that we will be out of sync with NAS410.

KP, C Dootson, SW, JD and C Durrant voted for a six month transition period therefore making date for implementation by 10/9/2015.

Action 10/2015 – JB to draft something to go on the website to advise where they can buy PREN4179 from

Action 11/2015 – NLS to email JB's article regarding NAS410 to the all the OA/IA agencies and get this put on the website under the NANDTB page

#### 6. Qualifying Agencies

#### a. Oversight Matrix - update

NLS tabling the Matrix update. NLS confirmed we have already had a number of people volunteer.

C Dootson asked what the expectation was for reporting after an observation visit? It was agreed that an informal email/report was acceptable. NLS confirmed that it varies and we do get emails and 2 page reports.

#### 7. ANDTBF including NAS410/EN4179 update

JB stated that the NAS410/EN4179 harmonised standard has now been issued as a PR EN.

JB confirmed that the only comment that he wanted to make on the forum and NADCAP was with the requirements in the standard now where it says about the specific exam and the general exam where it is under the Board and it is generic widen the scope. There is now a requirement to do a specific exam and a supplemental practical exam so with NADCAP the initial agreement was that where the exams were in control of the UK Board there was no requirement for the NADCAP auditor to come and look at the exam papers. With the change in the standard the question has now been asked on the supplementary exams are they under the control of the Board or are they going to be under control of the RL3 on behalf of the employer. If they are under the control of the Board then NADCAP will not have to look at them. If they are under the control of the RL3 then the NADCAP auditor will want to see them.

JB was not at the meeting in Berlin however the Americans are thinking that we have gone back to where we were and that the audit exams now need to be available for review at the audit. Lou Truckley has asked JB for a response regarding this and what JB intends to do is before the meeting try and explain this to all the members with a view that the representatives at the National Boards when they come to the next meeting have to be quite clear about wherever you are in the country that you operate will there be a requirement for employers to have to administer these supplemental exams and who will be responsible for controlling them. We can then produce a document that the NADCAP auditor will look at and it will tell them whether or not there are supplemental exams and who they are under the control of. Therefore if they are under the RL3 then the auditor will want to see those and audit them. There is nothing that says there is a minimum of 30 questions, it is whatever is considered necessary to cover the additional employer requirements.

JB confirmed that we are currently going through and getting the Aerospace Boards to provide an update on how they are operating as well. Lots of countries have Boards and they are all operating in different modes and manners. JB stated that its Board has to come up and do a presentation that says how they operate and explaining where their constitution is. 6 countries have done this and the remaining ones will be presenting on 7 May in Seville. Once they have done so they will be available on the website.

JB also mentioned that we are in the process of restructuring the EFNDT website. TG confirmed that this had been done.

#### 8. Pt. 145 Orgs, QAs and SIG members Update

GMc confirmed that he received a question from a Part 145 organisation.

This was shown to the Board and JD stated that this reinforces under the 2014 now where it follows that experience hours, past documentation, supervisor and all the rest of the information should be made available for review. It means when you come to audit now that they will expect to see X amount of hours against the qualification. JD stated that this can't be done so he was looking after an alternative means of compliance which is where the AOB item A comes in. There are a couple of reasons behind this and they are currently struggling to understand where the number of hours directly relates to your competence and especially as NAS410 and EN4179 has just moved from 500 hours to 800 hours in 3 different methods with no real discussion point on that. JD asking where the figure originally came from and why and secondly the competence is based on an assessment and a final qualification. Yes there is a use of experience in there but what they would like to do, or they do it anyway and they do a gradual and progressive competence assessment on their L2 and L1 as they go through their experience. They are checked out by L2s against the competencies required for that level and only when they are found competent by a L2 in doing it can they then be put forward for their L2 specific and practical exam. There is a timescale on that but that is irrelevant, the point is that they have someone who is maybe doing one task and at the moment they have to do that for

1200/800 hours in Eddy current and at the end of that they could fully qualified as a full blown L2, which is wrong because you are not checking out the competencies just in that one thing.

JD asked if the Board could give him alternative means of compliance, whether they can do so, but they would like to see an ability to assess on competence rather than just having a mandated 800 hours or whatever the hours period is to be complete before we can sit an exam.

DG said that it is not before you can sit an exam, it is before you can be certified. JD said that it amounts to the same thing and DG said that you would never change that. JD confirmed that he is not saying that, he is saying can they have alternative means of compliance. Can the Board do that?

JB said that the experience hours are there and we cannot go below that. JD stated that if that is your statement, then that is your statement but the probability is that when the candidates come up for assessment they will be short and they won't be going through certification. They are one of the biggest users of NDT in the UK definitely will be coming back of out same place that they fought to get in, you actually squeeze to get in to it in the first place.

MC stated that what we have to remember is that their guys are not permanent NDT guys they are first and foremost RAF technicians, they take them from that background and then they put them on a tour for 2/3 years. They have to be fully qualified in 5/6 methods and they have to be able to be posted anywhere in the world at any time. They only have 2/3 years to qualify. It would be more helpful to them if they qualified as soon as possible. JD confirmed he had been in consultation with American Defence sources, Canadians, New Zealand and Australian's and the mood there is all the same. The American's military are just coming open with the idea of re-establishing something along the lines of MIL410 which was a precursor to NAS410 because they believe that what has come out of what was MIL410 and gone in to NAS410 has been hijacked and been impossible to work for.

They are saying that they do not work under and do not comply with NAS410. The only people who do comply with NAS410 are the main depots, Nav Air and US Air Force. Their military personnel do not. DG confirmed that there are alternative schemes however they do have very similar experience levels whichever scheme you look at and JD stated that that was the point it may be in-house scheme for 5/6 nations. There is an ongoing project so that we can allow each other nations to work on each others aircraft and NDT has been chosen as one of those first schemes and what they have to do is assess each other and state what people are going to carry out NDT on each other's aircraft so they are base-lining that at the moment and it is likely that there are going to be some possibly Australia, New Zealand and maybe Canada and the UK who do something initially as they are all pretty much based around EN4179/410 as a requirement but they all have the issue with experience. The Canadians are moving away from central certification because they can't comply. So the upshot is that we would like to be able to stay and it would be our intention to do so if at all possible. They can meet EN4179 in every other aspect apart from those experience hours that is stopping them.

JB confirmed that the only thing he could suggest is defining it in the MAA written practice. JD confirmed that in EN4179 itself under the experience documentation requirements is quite explicit but just because you say you can write off X number of hours it doesn't count. JB asked if they have any NDT experience and JD confirmed they are all aircraft engineers. They are all of a supervisory status and they all know about the aircraft docs, what an aircraft looks like, what components are on the aircraft, where you go and what you do.

SA asked under the MAA rules if they can exempt themselves from certain aspects and MC stated that realistically they could allow JD to continue as they haven't stated in the regulation they need to follow in EN4179 so that is only in his written practice. Obviously from a regulatory point of view they prefer to stay within the standard and meet the standard in every other way. SA asked if they could not except themselves just from that part and there are some complications because they work with Part 145 they have points of awkwardness where they come up against each other so for them if the Board exempted them from that particular mark then they will still equal in status when they complete contract wise.

JB confirmed that the Board do not have any authority whatsoever to except anything below the standards. JD stated that the standards are the level to be achieved which is what competence is about and EN4179 states how you are to achieve it and JB confirmed it states the minimum requirement and it cannot be less than that.

DG asked how this effects the question originally asked and JD stated it effects the question because the company involved is actually trying to seek the fact that their guy has got EN4179 accreditation and they have been audited in the past and they have been given EN4179 accreditation so therefore a box needs to be ticked and off he goes but the company are looking at it because they are not sure how it works. DG confirmed that they would have to give him extra experience he would have thought before they certify him that is the only answer.

GMc stated that the question has been posed because they have been asked to employ a person and they have to make the decision whether they can employ him or not. He knows what he will have to do if he employs him but does that employer want to employ him with a couple of years experience.

JD asked where the science was behind the hours requirement. Yes it is laid down but it has suddenly dropped by 400 hours. DG stated that the experience hours came from ASNT-1966 apart from minor alterations that is where it comes from. JD stated it does not state why and where is the bit that says if you don't do so many hours then you won't have the experience to be able to do it because of the probability of testing or whatever. KP stated that when those numbers were actually plucked from the air the people who probably sat around had a lot of grey hair at that particular time. Those people are probably no longer with us for us to challenge back to and unfortunately people won't challenge those numbers because it takes too long.

JD stated that "the risk is on him". The employer has to make the decision on what experience.

JB confirmed to GMc that the minimum experience has to be defined in the written practice and it was agreed that GMc would direct him to the information contained in EN4179.

#### 9. Regulators Update

SA stated that there wasn't a lot from him. In the previous minutes there was a bit of feedback about 4.4 B2 on the notes about there being 4 site visits a year. Whilst this was being written SA he stated that there was no way that he was going to get that through on their policy as a way forward as this doesn't fit all organisations. SA spoke to Neil Williams and there is no way they will go down to 4 visits a year.

JB confirmed that there needs to be a contract and an SLA. This needs to be in place to ensure that external L3 commits sufficient time on site.

A lengthy discussion took place regarding GR23. However GR23 needs reviewing now because of the new EN4179.

SA confirmed if anybody had any comments about GR23 to direct them to him. SA will review against EN4179 and then send round with further changes and then it can be discussed further.

SA confirmed the main task for the special services the UK CA has got the action to re-write Part 145 F.30 regarding special services. JB confirmed that this will probably also come up at the Forum meeting in May. EASA have not been at that meeting but they are still engaged and are being kept up to date with what the Forum does.

#### 10. OA/IA Group

DG reported that the last OA/IA user group meeting was on the 26<sup>th</sup> February. DG confirmed there was quite a good attendance compared to the first few meetings. DG stated that most of the meeting was taken up with Karen Reader's presentation which was really good and very useful.

#### 11. Any other business

a. Will the Board permit a UKNANDTB 'Alternative Means of Compliance' against the mandated experience hours

This was previously discussed point 8.

b. The witnessing of audits per year should be based upon number of auditors not number of NANDTB members

JB confirmed that it should be at least once a year.

c. SETSCO

NLS tabled the email from CT – a long discussion took place regarding the same and it was agreed we would write back to them although NLS confirmed that as CT had spoken to him, he needs to clarify more of what was said. It was confirmed that we would notify them that NANDTB\_12 is under review and provide more clarity about what specific training is needed.

Action 12/2015 – JB to confirm that NANDTB\_12 is under review

Action 13/2015 – JB, GMc and CT are to review NANDTB\_12 and provide more clarity regarding specific training

#### d. NANDTB\_24 says the test visual acuity test contained therein complies with ISO18490

NLS stated that basically JB has confirmed that NANDTB\_24 wants replacing with the standard.

#### e. AETC IA Audit

JB confirmed that AETC IA audit when they do the practical exam they assign a score of 100% or 0 and because the 100 skews the composite they decided they do not include the practical score. The composite is just made up of the practical. NLS confirmed this was general and specific so a response has come back saying that you cannot do it. JB confirmed that it is all about following procedures, using equipment and there is supposed to be a checklist and an NCR has been raised because there is no checklist. The practical has got to be part of the composite score, the standard requires it and there is no deviation.

#### f. Practical exams conducts by OA's

GmC stated that he was concerned about some of the training schools who conduct practical exams because they do not monitor the students and they provide them with a sample. There is a checklist which should be completed by the L3. A discussion took place regarding whether or not even if the checklist was completed how does the auditor know that the L3 was there.

Discussions taking place regarding this.

DG suggested that we put something out with all clarification with what should be happening.

Action 14/2015 – OA/IA to look at this and stated that it must be under control unless GR23 is revised

## g. Procedure Marking L3

DG confirmed that the issue with this is that the 10 point checklist at different training centres for L3 exams is different so the OA/IA user group wanted something that was different so that everybody marks with the same sheet. The consensus was to use the PCN L3 marking sheet for EN4179 L3 practical exams. CT would like this to be made in to a document. JB asked if this was for all methods?

Action 15/2015 – NLS to send round the PCN L3 marking guide and send it back to CT with comments

## 12. Date and location of the next meetings

51st meeting - Friday 19th June - Flybe

52<sup>nd</sup> meeting – Tuesday 8<sup>th</sup> September – BINDT Conference, Telford

53rd meeting - Wednesday 9th December - BA or BINDT offices

## Annex A – attendance and apologies for absence at the 2015 NANDTB meeting no. 50

Name	Representing	In attendance	Apologies for absence
Alun Williams	(Airbus UK)		1
Bobby Scott	(Bombardier)		1
Carl Sheppard	(British Airways)		1
Chris Dootson	(BAE Systems)	1	
Chris Durrant	(Messier-Bugatti-Dowty)	1	
Clive Worrall	(British Airways)		1
Colin Thomas	(Training & Examination Group)		1
Dave Griffin	(Training & Examination Group Deputy)	1	
Jes Dugard	(MoD)	1	
Graham Mcleod (GmC)	(Honeywell)	1	
Graham McCully (GMcC	(Pt. 145 Orgs, QAs and SIG members)	1	
Jon Biddulph (Chair)	(Rolls Royce)	1	
Keith Griffiths	(Rolls Royce)	1	
Keith Phillips	(Airbus UK)	1	
Kevin Pickup	(BAE Systems)		1
Mandy Cox	МАА	1	
Nicole Scutt	(BINDT)	1	
Patrick Boulton	(BINDT)	1	
Phil Berkley	(Agusta Westland)	1	
Rob Bright	(Flybe)		1
Stuart Algar	(Civil Aviation Authority)	1	
Stuart Wroot	(Agusta Westland)	1	
Ted Blacklay	(Civil Aviation Authority)		1
Tracy Grant (Secretary)	(BINDT)	1	
	Totals	16	8

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16/2014	NANDTB_15 – review by; C Dootson and A Williams	ONGOING See action 14/2014
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12/2015	JB to confirm that NANDTB_12 is under review	
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