

UK National Aerospace **NDT** Board

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THE 64th MEETING OF THE UK NATIONAL AEROSPACE NDT BOARD

Meeting Date: Tuesday 18 September 2018
Time: 10.00am
Location: Bombardier, Belfast

Minutes

NANDTB/2018/M3

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

1.1 Nothing to add

2. Attendance & apologies for absence (Annex A)

Refer to attached.

TG went through the apologies.

3. Notes of the 63rd meeting (distributed earlier)

a. Confirmation

The minutes were confirmed and will be uploaded to the website as confirmed minutes.

Action 19/2018 – TG to upload minutes from 63rd meeting

b. Review of allocated actions

Ref	Actions brought forward	Remarks
10/2017	BF/NC to email individuals requesting this information for L2/L3 personnel (GR23)	CLOSED - Ongoing - NC confirmed there are amends that need to be done. Next time there is a meeting NC will come with the amended GR23 to ask for input. This action is to be closed and GR23 to be added to number 10 on agenda.
27/2017	AMENDED WG to agree criteria to manage OA's consisting of MC, RB, JB, NC, NLB and PJB, with MC being the lead on this WG	Ongoing – WG needs to meet even if by Webex, however commitment is needed, PJB suggested that there needs to be auditor input.
43/2017	JB to write article for NDT News	CLOSED Advisory written and on web and need to get something put in NDT News

44/2017	JB to draft an advisory covering this	Ongoing – KP to chase JB
12/2018	TG to upload minutes from 62 nd meeting	CLOSED
13/2018	TG to get the website update with KP's details	CLOSED
14/2018	TG to upload the new version of the document – NANDTB_06	CLOSED
15/2018	KP to provide TG with new nomination letter	CLOSED
16/2018	MC will look at NANDTB_16 and draft some wording and will circulate via email to the Board to approve	Part Closed KP still needs to look at NANDTB_16
17/2018	JD will recirculate the wording	CLOSED
18/2018	KP to draft a letter to regarding the payment going forward of the audit costs	CLOSED As of January the TOR will be amended documents 1 and 3 and from January £100 from each of the Board members will be requested. Action 20/2018 – KP to contact PRI regarding the next NANDTB audit

c. Other Matters

None

4. Membership

a. Review NANDTB_06

This document was amended in real time.

TG confirmed that she would amend GL as she had had his letter extending his term.

AW stated that John Iley was to be removed and he will confirm when he has a alternate.

Action 21/2018 – TG to remove John Iley and amend GL's details and upload the new version of the document

5. UK NANDTB Document Review

a. NANDTB_12 – Under review

This document was done along with the checklist in readiness for the PRI audit. JD stated that there were some issues with the checklist also. JD had sent an email with the issues and also Karen Reader has stated that she is not happy with the checklist.

It was noted that the auditors should have some input with regards to this and MC did state that there was a lot of input from Alan Parsons. JD stated that it is not up to the auditors to set the checklist, it is up to the Board to tell the auditors what they are looking for.

After discussion it was noted that these two documents need to be reviewed together.

Action 22/2018 – A WG to look at NANDTB_12 and the checklist was put together, this will be done in the PM of 10th December 2018, the day before the next NANDTB meeting – WG of KP, MC, GL and PB.

b. NANDTB_16

KP needs to look at this - see action 16/2018 above.

c. NANDTB_17 – GL

The amended document was tabled.

There were a number of queries that JD had and GL went through and clarified these.

There was a part regarding the MAA/CAA and because it is a UK document these should definitely be included. KP stated that he would like to use L2 Limited's at his company, he sends an email to NC, what happens next?. NC stated that this is about the qualification standard. Basically if someone wants, under the D1 rating within the 145 to use L2 Limited to sign any AS41, this needs to be controlled in the written practice, needs to be signed and approved by the person and this would then go through to NC (CAA) and they would accept this.

NC stated that there is a restriction in to limit this for one technique per method but you can have multiple methods, this is fine, however may be slightly restrictive. KP stated this was put in to stop abuse of the system particularly in the ET case. You can have a L2 Limited in one or the other technique but you cannot have a L2 Limited in both. If you progress to a L2 then this is a stepping stone. GL did however state that this could be added in the written practice.

With the specific exam, MC thinks that this should be defined by L3, as everybody wants different things out of someone who is a L2 Limited. MC stated that restrictions are being put on people who use this. KP stated that in fact the Board are allowing companies to utilise a L2 Limited approval and if they still wish to do so then the criteria set out in this document is how they need to do. In-line with the conversation that occurred in Exeter, you must do the full training, general and specific, it is only the practical and experience hours that are being cut down. KP as a L3 exam administrator and a Board member is happy with this.

JD brought up the point about somebody having to be recertified at intervals not to exceed one year,. If someone has successfully passed for 5 years (specific examinations and practical examinations), why can someone not grant, subject to the other techniques, as someone has been doing this for 5 years full L2 approval. NC stated that at the moment there is no competency based scheme. JD did state however that the person has proved themselves for 5 years. NC stated that there is a proviso within 4179 to have an equivalent standard. If an RL3 assists someone and they come forward stating that they would grant this individual L2 because of all that is being done, then this can be considered. 4179 talks about the RL3 determining the equivalent experience.

JD also stated about the examples given and if a flowchart may be easier for people to follow.

If the L2 Limited shall fully fulfill the requirements of L2 for general and specific, why do the Board feel that there is a need for a specific exam every 12 months? GL stated that this was due to motivation, there are people who do minimal hours and nowhere near the appropriate hours to cover this.

This document was voted on, all in agreement of publishing this.

GL did state that there may be a possibility of this being presented at the Aerospace Forum next spring and KP was in favour of this, he would speak to David Hallam about this.

Action 23/2018 – TG to upload this document

d. NANDTB_19

This document is due to review. A WG put together to do this.

Action 24/2018 – WG of MC/PB and AW has been put together to review this document

e. OAQS11

TG stated that an audit had been done, a form was provided to GMcl who completed this form and stated he was happy with this. Alan Parsons had copied this form over so it could be used as a form to review the auditors. GMcl confirmed that the document was good as he had used it.

The word auditor/assessor needs to be the same all through the NANDTB documents.

It was noted that the feedback of the form when completed should go back to the Board for review.

The examiner days that are held are good in that they state how something should be standardised and benchmarked. Do the auditors need an auditors' day with members of the Board present for guidance on interpretation. This should be done after the review of NANDTB_12.

TG confirmed that Clive Hammond will be leaving shortly.

After a lengthy discussion it was noted that TG would speak to Alan Parsons about the checklist and circulate with the minutes for review.

KP confirmed that Alan Parson should be thanked for the work he has carried out, however the form needs to be reviewed fully.

Action 25/2018 – TG to circulate the OAQS11 with the minutes for perusal

6. Qualifying Agencies

- a. Auditor Oversight, review matrix
TBC

7. Standard Review

a. EN4179

KP confirmed that the all the amendments to 4179 that the Boards suggested were collated by Chris Stevenson, the Chair of WG 15, who have now met and the document was reviewed in great length.

This was amended in real time as per the lengthy discussions taking place.

It was noted that there are 2 members from each country who participate on the WG who then put the suggestions to the standard owner and they will then go forward to the harmonisation

team. It was noted that JD is looking at replacing JB on the WG, however JD needs to be approached to do this. This is not a Board appointment and the WG needs to approach JD.

KP will write to Chris Stevenson and see how to formalise that a member of the Board has a seat on the WG. If this is agreed is JD happy to accept this seat?

Action 26/2018 – KP will write to Chris Stevenson, as the Chair of that WG to formalise that the Board has a seat

Should GMcC be invited to bring with him an alternate, should there be a Prime and an alternate and to both be invited? From this discussion it was suggested that GMcC should bring with him an alternate and also as he is representing the Pt 145s and should he have a vote?

It was noted that this should really be discussed with GMcC, however MC stated that if GMcC gets a vote, that MC/DG should also get a vote between them. To added to next agenda for completion of discussion when GMc present.

b. Competency Based assessment – JD

JD giving a quick update of the position of this.

The wording was circulated after the last meeting, this has gone forward as a harmonisation piece, there is a meeting scheduled for W/C 24th September, next week is when it will be decided if they are going to change it and then the two harmonisation pieces will be put together.

KP asked if there was a feeling of whether this was going to get accepted. Lou Truckley the Chair of the NDT sub-committee said that the USAF were against it, but that is the only person as of yet, however JD was surprised of this as they use a competency based scheme.

NC stated that competency based schemes are quite prevalent within 145. 145 A30 defines that anybody for any role will be competent and it is up to the organisation to define if they are competent. Everybody learns at different rates, however if it is in the employers interest to get someone through then they will do this – this will ultimately encourage 'short cuts' and abuse of the system

Training Developments

At the BINDT Conference there was a presentation by ASME and ASME have produced a document called ANDE-1 which they hope to offer in the Nuclear Sector for UT initially. MC stated that the US does not have any central certification subject to independent audit, without this there is no impartial approved training or examinations, and no oversight of the organisations which take responsibility for certification.

Before this goes ahead, some policies and documentation needs to go behind this as people can abuse the system.

JD was under the impression that the wording was approved and it was voted upon at the last meeting, however after some disagreement within the room, it was noted that the wording had been circulated but nothing has been received to say anything any different. MC confirmed that this does not mean that this is approval as nothing has been received but just that this is ready for further discussion. At no point have the Board stated that they want to run with this.

KP stated that competency based assessment in an ideal world is great suggestion. At the moment however there are just too many loopholes.

KP stated that there were many concerns in the room regarding this and if this is accepted by the harmonization group, then there is a lot of work to do to write guidance of how an employer needs to implement the CBT system under the regulator. KP would hate for this to go in to the Standard and then Board states that this cannot be accepted.

It was however noted that the outcome will be stated next week and JD will keep the Board informed of this asap.

8. ANDTBF (JB)

Next meeting November in Dublin.

9. Part 145 Orgs and SIG's – Input (GMc)

GMcC was not present and nothing had been sent through prior to the meeting.

10. Regulators Update – (BF/NC)

a. Brexit Update

KP stated that Brexit is coming and he is getting enquiries from around the world, people who have certificates with BINDT or UKNANDTB and they are concerned. It would be nice for the Board to put something out.

What does the future look like for PCN Aero certificate type holders, does the Board exist as of next March in the eyes of EASA, what does the standing with Latvia and Iceland do for the UK, certain primes already have set up other offices in different countries so they are recognised by EASA, does the UK need to do something like this, lots of questions that need to be debated and the board would like to have information to put out to the users.

NC stated that as it stands the UK Government are in negotiations with the European Commission and the CAA are working behind the scenes and they cannot proceed until they are given direction from the DFT. The official instructions are :-

“Since the referendum vote, both the CAA and the government have been clear that remaining part of the EASA system once the UK leaves the EU would ensure the best outcomes for passengers and aviation safety in the UK and the EU. Ultimately the CAA's future role within the EASA system is not a decision for us but rather a matter for the negotiations between the government, the European Commission and the remaining 27 member states. Our current expectation is that upon formal withdrawal from the EU at the end of March 2019 an implementation or transition period will be in place through to December 2020, this will provide an additional period of EASA membership and will offer more time for the future UK's future relationship with the EU to be determined including the CAA's relationship with EASA, it is expected that this implementation period will be ratified between October this year and early 2019. This ratification process however cannot be guaranteed, therefore we are preparing contingency plans with various outcomes including a no deal scenario. We encourage all companies in the aviation and aerospace sectors to consider their own contingency plans for a range of different Brexit scenarios. The Government will shortly be publishing, technical notices. For high businesses in aviation should prepare for a no deal scenario”. This statement then sends you to the CAA website.

NC stated that one of the points the commission have said is that nothing is agreed until everything is agreed. In the absence of a deal the UK will become a third country, i.e. like the likes of Singapore. The UK PLC will continue as normal and the Board will be a UKNANDTB, the UK CAA will recognise the UK Board and PCN Aero is recognised by the UK CAA and so anybody with a PCN Aero

certificate within the UK PLC will continue to be recognised and accepted.

KP asked if this was the people who already have the qualification and NC stated yes. KP stated that some concerns he has received are at the minute it is an EASA recognised scheme, what is the difference with being an EASA recognised scheme and a CAA recognised scheme in terms of people doing operational maintenance on non UK based jets. NC confirmed that anybody operating in and out of the UK, i.e. like British Airways and other operators may need a UK AOC. They will need a UK recognised approval along with their maintenance personnel. Any suppliers outside the UK supplying a UK operator will need a UK issued / recognised approval. MC asked if this follows the other way anyone with a UK approval providing services outside of the UK will therefore need a European approval, NC confirmed this would be correct. MC stated that PCN Aero would therefore not be recognised outside of the UK and this is correct.

EASA have created a user guide on this, it is personnel on an EN4179 scheme that are qualified by an Outside Agency under a European NDT Board. Outside Agencies under the UKNANDTB will not be recognised. It was suggested that perhaps the UK should be collaborating with another European Board. NC confirmed that it was up to the Board to decide and there is an option because UK represent the Latvian Authority and the Icelandic Authority. NC confirmed there could be an agreement. What will cease on March 29th is existing bilateral agreements, the EU has a bilateral agreement with America, Canada and Brazil. Without a ratification of the transition period, the UK will become a 3rd country so the bilateral agreements negotiated under EASA no longer apply. The UK is seeking its own bilateral agreement with the FAA, which is in advanced stages and also with the TCCA and ANAC. Another option, as an example the National Aerospace Board for Australia is recognised by EASA so that could also be an option.

The UK CAA have a good relationship with EASA and the UK CAA participate quite heavily with EASA so it is unlikely that EASA do not want to do a deal, it is the politics.

NC advises the Board that he cannot answer any questions and to notify the Board that there is a Centralised Brexit Team coordinating FAQ's, the CAA will be issuing some further guidance which is imminent.

From a regulators point of view UK PLC is protected and outside of that, cannot confirm.

KP asked if Lufthansa flight landed at Heathrow, who could inspect that, does a person holding a PCN approval with a UK certificate do it? NC stated that Lufthansa can issue a single event authorisation because UK are still signatories of ICAO and the whole structure is still ICAO compliant so for a licensed engineer it is an ICAO annex 1 license so Lufthansa can issue an SEA to a UK license holder.

British Airways personnel based in America mainly have FAA A&P licenses, they do not have EASA 66 licenses and this is in the rules as it is under the national aviation regulations of the State in which the line station is based. MC asked if BA maintenance Cardiff would be able to bid to provide a full D check for Air France? NC confirmed that BA Cardiff could apply to EASA and EASA will become their component authority. They can apply and have an EASA 145 approval.

Suppliers to UK PLC will need a UK recognised form 1, they would need to issue a UK CAA Form 1.

The advice is however to consider a no deal scenario and to consider the implications of what that might mean and to consider contingency.

KP asked as the Chair of the UK Board if he should contact Carmen Chirita at EASA to ask her what the Board needs to consider doing to be independently recognised by EASA? KP also suggested

that he should discuss an AMOC with Carmen Chirita. It was noted however that KP would be seeing Carmen Chirita at the next ANDTBF meeting in November.

It was suggested to explore the relationship with Iceland and Latvia.

It was also asked if there are any outside agencies in Iceland and Latvia and are these being overseen, MC confirmed that she imagined there were as they all come to the UK for training.

The UK could also be like the Australian Board and apply for an acceptable means of compliance direct to EASA.

For the update for people who were not in attendance at the meeting is :-

All current approvals will be honored going forward, within the UK PLC. The individuals outside of UK PLC, this will effect.

NC did state that the UK are still part of ICAO.

www.bainessimmons.com have a good document on their website.

KP suggested that all of the above needs to be explored.

At the December meeting, it can be discussed whether something needs to be brought to people's attention.

11. OA/IA Group (MC)

No meeting since last Board meeting.

Repeat NCRs has been brought up before, there are agencies who have repeat NCRs in certain areas and the Board needs to take stronger steps to ensure compliance with the requirements.

It was discussed that these could be categorised or a merit system could be created.

The document that was sent to MC for discussion as part of this was the NADCAP OP1110 where you have 3 audit levels :-

- a. Supplier stops the audit or accreditation process;
- b. Excessive numbers of NCRs;
- c. Severity

If also the audit is not completed within 3 renew cycles it goes to staff engineer.

At the current time there is not enough detail to have a look at this. The number of NCRs per OA/IA needs to be looked at to determine if there is a problem.

Action 27/2018 – OA/IA to create a dashboard to look at excessive number of NCRs/repeat NCRs and top NCR's for a specific year - to look at every meeting

12. Any other business

- a. **Fee for PRI audit**

Discussed earlier in agenda, all voting members will receive something from KP and also this does include BINDT at a voting member.

13. Date and location of the next meeting

Day before for those who are attending the WG for NANDTB_12/checklist about 1/1.30

11th December – SWS - Cardiff

Actions allocated and carried over from meeting 64th Meeting

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27/2017	AMENDED WG to agree criteria to manage OA's consisting of MC, RB, JB, NC, NLB and PJB, with MC being the lead on this WG	Ongoing – WG needs to meet even if by Webex, however commitment is needed, PJB suggested that there needs to be auditor input.
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Annex A – attendance and apologies for absence at the 18 September 2018 NANDTB meeting no. 64

Name (member unless stated otherwise)	Representing	In attendance	Apologies for absence
Alun Williams	Airbus UK	1	
Ben Forshaw (Observer)	CAA replacing TB		
Chris Durrant	Safran Landing Systems Ltd		1
Clive Worrall	British Airways	1	
Dave Griffin (Co-opted)	Vice Chair representing BINDT OA/IA Group		1
Guy Lawton	MoD	1	
Graham Mcleod	Honeywell	1	
Graham McCully (Co-opted)	Pt. 145 Orgs and SIG members		1
Jes Dugard	MoD	1	
John Brand	Safran Landing Systems Ltd (Pt 145)		1
Jon Biddulph	Rolls Royce		1
Kevin Pickup (Chair)	BAE Systems	1	
Michelle Clapham (Co-opted)	Chair representing BINDT OA/IA Group	1	
(Robert) Neal Cuddy (Observer)	CAA replacing TB	1	
Nicole Banks (Observer)	BINDT		1
Patrick Boulton (Voting member)	BINDT		1
Paul Harris	British Airways		1
Phil Byram	BAE Systems	1	
Ralph Duff	Bombardier	1	
Rob Bright	Flybe		1
Steven Arrowsmith (Observer)	MAA	1	
Stuart Wroot	Leonardo Helicopters	1	
Tracy Grant (Secretary)	BINDT	1	
	Totals	13	9