UK National Aerospace NDT Board

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MINUTES OF THE TENTH MEETING OF THE UK NATIONAL AEROSPACE NDT BOARD

Meeting Date: Thursday 23rd November 2006

Location: Airbus UK, Filton, Bristol

 The agenda was confirmed with four additional matters to be dealt with under any other business.

2. Attendance:

Jon Biddulph (RR – Chair), Graham McCully (MML – co-opted), John Hewitt (Airbus UK), Trevor Hiscox (Airbus UK), John Thompson (Sec), Chris Dootson (BAE), Colin Thomas (Messier Dowty), Phil Berkley (Westland), Eric McIlroy (Bombardier), and Roger Hogarth (BA).

Apologies for absence: Ian Chapman (CAA).

3. Notes of the last meeting

- a. The notes of the last meeting (distributed earlier) were confirmed as an accurate record, to be published on the Board's website as <u>confirmed minutes of the ninth</u> <u>meeting</u>. Action 32/06: JRT
- Actions assigned at the last meeting (not covered by the agenda) were reviewed. All
 actions were considered to have been completed with the exception of **Action 22/06a**,
 which was carried forward.
- c. There was one matter arising that had not been assigned a formal action number (the drafting of the Board's annual report) which was formally recorded as an action and assigned an action reference at the present meeting.

4. Membership

- a. The <u>current list</u> of member organisations and nominated representatives was updated following receipt of letters from member bodies re-nominating their representatives. Nominations remained outstanding in respect of Agusta Westland, Airbus UK, BAE Systems, British Airways, Honeywell and Rolls Royce.
- b. It was noted that Keith Phillips had left Messier Dowty, which had nominated Mr. Colin Thomas to represent it. The Board welcomed Mr. Thomas to his first meeting, and agreed that Mr Phillips' contribution to the gestation and work of the Board should be recognised with the award of a certificate. **Action 33/06:** Secretary to draft certificate for Chairman's signature.
- c. The meeting then discussed the co-option of a representative of the UK Training and Examination Group (UKTEG). The present version of the Board's guidance on this was considered to include unnecessary criteria, and The Board's terms of reference for co-opted representatives, NAndtB/09, was reviewed and amended in the light of an email from Colin Thomas (which had not been copied to the Secretary an omission for which Mr. Thomas apologised), a member of the UK Training and

Examination Group (TEG), which suggested a TEG mechanism for selection of a representative to be offered for co-option by the Board. Following this revision, it was agreed that the onus was now upon the TEG to internally select an individual to be offered for co-option, and that this message would be communicated to the TEG chairman by the Board Secretary. **Action 34/06:** JRT to communicate the changed NAndtB/09 criteria to Mr. Lavender, and to point out that action now lay with TEG to internally select an individual to be offered for co-option by the Board at its next meeting (22 February 2006).

5. NANDTB documents

- a. The Board noted the status of its published documentation as listed on NANDTB/01.
- b. The Board's constitutional documents (NAndtB/02 to /05 inclusive) had been revised and updated at the previous meeting, but the status of these documents had not been updated in NAndtrB/01. This oversight was corrected at the present meeting.
- c. It was agreed to publish an annual report. Action 35/06: JRT to draft an annual report for Chairman's review and comment prior to tabling for approval at the next meeting.
- 6. Development of new qualifications for new technology
 - a. A PowerPoint presentation, based upon the details in the present NAS 410 / EN 4179 'strawnam', had been developed by the Chairman and was presented at the meeting.
 - b. There followed a period of discussion centred around the implementation of IRT at BA, Agusta Westland and Bombardier. It was pointed out that the CAA GR23 requirement was for the nominated Level 3 (or one of the Levels 3's employed by the company) to hold central independent qualification certification for the NDT methods used in house. However, the CAA leaflet CAIP 410 opened the door for the NANDTB to recognise the appointment of Level 3 qualified by other means.
 - c. The Board accepted the principles detailed in the PPP, but it was agreed that some minor 'adjustments' would be made by the Chairman, and the modified PPP file circulated for review and comment prior to publication on the Board's website. **Action 36/06**: JB to circulate draft PPP proposal (in generic form) for comment by 14th December 2006, prior to publication as a Board guidance document endorsed by CAA.
- 7. External regulations, standards or specifications (to advise/note changes)
 - a. Mr. Barker summarised the present position regarding GM23 and CAIP Leaflet 410. The CAA had been undertaking a general updating of these documents, and had taken into consideration the comments offered by the Board, including the disappointment that had resulted from the splitting of Airworthiness Nocite 94 into CAIP 410 and GR 23.
 - b. CAA personnel had recently attended 'standardisation training' for 'cross auditing' at EASA, and had taken the opportunity to clarify the powers of national authorities. As a result, it was now recognised that, under EASA part 21, it was largely up to the CAA what requirements for NDT personnel certification are in place nationally. In order to establish best practice, the CAA can therefore publish guidance/criteria for industry to adopt/follow.
 - c. From a regulatory point of view, this could lead to divergence at the various national levels! However, from a purely UK perspective, this would enable the CAA to return to one airworthiness notice for NDT in service and during manufacture. It was anticipated that a draft, which would continue to mandate a requirement for the NANDTB, would be ready for circulation to the Board for comment by the next meeting.
 - d. Discussion turned to the use of Level 1 (Limited) and Level 2 (Limited / Special) certification. Ian Chapman's recommendation was to retain the existing definitions of L2 and L3 duties and responsibilities, but to add the possibility of Level 1 (Limited) certification, as defined in EN 4179, to include the ability to certify inspections if specifically authorised so to do by organisations working to approved maintenance data. Thus it was likely that an additional paragraph under the existing GR 23 clause 4.2 would be introduced to this effect (the CAA proposed text was projected for

- discussion / comment, and Mr. Barker undertook to email the proposed text to the Secretary for the record). The Board as a whole did not find fault with the proposed text projected, which was intended for maintenance organisations, but could be equally applicable to manufacturing /production organisations.
- e. A recent meeting of the NDT SIG had raised a question on the retention period for radiographs. Mr. barker gave a summary of the legal position, which appeared to require retention of records for not less that 3 years in production and 2 years in maintenance areas. However, he went to great length to point out that, if the records concerned affected continued airworthiness, they must be preserved without limit.
- f. Finally, Mr Barker spoke of a fairly major re-organisation within the UK authority, but emphasised that it was still intended to support the NDT SIG and the UK NANDTB.

8. Control of Qualifying Agencies

- a. The following <u>assessments</u> had been satisfactorily completed since last meeting, and all assessed organisations had been re-accredited.
 - The Outside Agency and PCN AQB reassessment of the <u>SWS of NDT</u> by John Thompson had on 6th September 2006 been witnessed by John Hewitt on behalf of the Board.
 - ii. LI NDT Had been reassessed as an Outside Agency on 31st October 2006.
 - iii. The follow-up audit of <u>TAECO</u> had been carried out by John Thompson on 20th November 2006.
- b. The Secretary reported concern that in some cases the nature of the training provided by Outside Agencies is very general, with job-specific training and examinations being left to the employer (as specified within the written practice). The Assessor considered that this is all well and good so long as the employer's compliance with this and other provisions of the WP is confirmed by an audit conducted by the Outside Agency, responsible/nominated Level 3, or NANDTB. In the case under review, there was no documentary evidence available to support that job-specific training and examinations had been carried out, even though four separate audits had been conducted by the OA appointed Level 3. This concern was reported to the NANDTB for discussion and resolution, and the Board noted that this would eventually be redressed once the implementation of internal training and examination was the subject of a similar level of control as that of Outside Agencies.

Action (not assigned a reference number since it is ongoing): Until that time, little else could be done except to emphasise that Outside Agency audits conducted for clients should focus on the provision of internal training/examinations by the employer where this was a requirement of the written practice.

c. No new applications for OA accreditation had been received since last meeting.

9. Liaison and contact with other NANDTB

- a. The Chairman presented a Report from EU Forum at 9th ECNDT (Berlin, Friday 29th September 2006). The notes of that meeting and all subsequent meetings would eventually be placed on an EFNDT web page for the European Forum for NANDTB. **Action 36/06**.
- b. It was agreed that Mr Biddulph would represent the UK Board at the <u>first European Forum</u> meeting in Paris on 1st December 2006. Mr. Barker pointed out that, if the question of EASA review and revision 9perhaps the joining) of parts 21 and 145 was raised, it would be appropriate to ask the question of the EASA representative: "where is the revision of parts 21 and 145 on the EASA 'rulemaking agenda' (1 yr, 2 yr or 5 yr timescale)?

10. Any other business

- a. It had been suggested that the Board consider the development of a PCN/Aero NDT level 1 qualification, but this did not receive the support of the Board.
- b. It had been suggested that the NDT Instruction Writing requirement be removed from the PCN level 2 examination since this was not a requirement of EN 4179. The Board

- noted that the PCN qualification examination complied with EN 473, under which such an examination was required.
- c. The Board had been asked to clarify what the Outside Agency should supply in terms of training and examination records to clients. There was considerable discussion on this question:
 - i. The OA certificate of success in the qualification examination has traditionally had an expiry date. Should it have anything more that the date of success in the examination, and a statement that the results remain valid for a specified period, e.g., 3 years?
 - ii. Should the OA certificate of examination carry a statement that this certificate is not an EN 4179 approval or authorisation certificate, which the employer must issue when all qualification criteria, as defined in the written practice, are satisfied?
 - iii. What should the OA issue? Certificate of qualification, statement of examination results, certificate of examination success, certificate of approval?

It was agreed that the board would issue a specification document stating the minimum information to be shown on the OA examination result notification. **Action 37/06:** The Secretary to ask OAs to send copy of their output document(s), and to concatenate returns for consideration at the next Board meeting.

- d. Vision requirement: Jaeger Vs Snellen Vs tumbling E? SIG discussion had highlighted a need for a UK aero-industry position to be agreed. **Action 38/06:** The Secretary to circulate presentation and associated documentation for info and discussion at next meeting.
- Date and location of the eleventh meeting of the UK NAndtB Bombardier, Belfast, Thursday February 22nd