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Your Ref.: Our Ref.: RM-011/009 Maliaño, February 26 , 2009

Subject: Acceptance by NRC of Accrediting Bodies belonging to ILAC for Calibration Services.

Dear Mr. McIntyre:

Presently NRC recognizes a limited number of Accrediting Bodies as third-party accreditation of calibration laboratories. Our understanding is that initially, NRC limited its review and approval to NVLAP and A2LA since those organizations were U.S. based and belonged to ILAC MRA. Further on, under specific requests for acceptance for different Accrediting Bodies by NPPs, NRC extended its recognition to other organizations considering their US based signatories to ILAC MRA such us IAS, LAB, ACLASS.

Above limitation triggers a significant impact for companies not settled in USA. Since NPPs operates under NRC requirements in USA, it is unlikely to be requested specific acceptance for a non U.S. accrediting body such us ENAC, COFRAC, DAP, SIT, UKAS, etc...and consequently the international framework for acceptance of foreign accrediting bodies for calibration services get excluded.

In addition, audits, in process surveillance or commercial surveys become unfeasible when applied to Accrediting Bodies or ILAC laboratories.

Concerning the international scope, the International Laboratory Accreditation Cooperation (ILAC) defines an arrangement by which any organization belonging to that network accepts a mutual recognition agreement. Since any of the accrediting bodies allowed by NRC belong to ILAC and their members attest their accreditations are equivalent, we consider reasonable to extend the acceptance of accrediting bodies as third-party accreditation of calibration laboratories to those accrediting bodies belonging to ILAC cooperation arrangement.

Hereby we suggest NRC to evaluate the acceptance of Accrediting Bodies belonging to ILAC as third party accreditation for commercial grade calibration services.

Sincerely,

Raúl Marcos.

ENSA Quality Assurance & Environment Manager.

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