



NUCLEAR ENERGY INSTITUTE

Russell J. Bell  
DIRECTOR  
NEW PLANT LICENSING  
NUCLEAR GENERATION DIVISION

September 16, 2011

Ms. Laura Dudes  
Director  
Division of Construction Inspection and Operational Programs  
Office of New Reactors  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Industry Proposal for Expanded Use of Internationally Accredited Calibration and Testing Laboratories – Response Requested

**Project Number: 689**

Dear Ms. Dudes:

The purpose of this letter is to request NRC support for an industry proposal to expand the NRC's current acceptance of third-party accreditation of domestic calibration laboratories for purposes of commercial grade dedication. NRC currently accepts third party accreditation of domestic calibration laboratories in lieu of performing a survey or in-process surveillance. The proposal seeks to expand the acceptability of third-party accreditation to include both domestic and international calibration and testing laboratories accredited under the International Laboratory Accreditation Cooperative (ILAC).

The proposal stands to benefit licensees and nuclear suppliers in terms of reduced cost and improved quality of calibration and testing services. If implemented, we believe it would also provide the basis for the NRC to clarify its regulatory guidance in this area, as recommended by the NRC Office of Inspector General in a June 2010 report. The importance of this proposal at this time is underscored by the increasingly global nature of the nuclear supply chain and the renewed focus of the NRC on commercial-grade dedication practices.

ILAC supports end users through the development of performance and monitoring standards and practices for assuring quality of procured calibration and testing services. In particular, the ILAC serves as the international forum for:

- Recognition of competent test and calibration labs worldwide
- Development of harmonization of laboratory accreditation practice
- Promotion of laboratory accreditation as a trade facilitation tool
- Assisting the development of laboratory accreditation systems

The industry proposal reflects input from licensees, fuel fabricators, suppliers, NUPIC members and EPRI, as well as ILAC itself and the NRC. In particular, the NRC has indicated that industry membership and participation in ILAC could provide the basis for clarifying existing regulatory guidance related to commercial-grade dedication. As we have discussed in greater detail with members of your staff, the following summarizes the industry proposed approach:

- NEI becomes a Stakeholder Member of ILAC on behalf of NEI member companies, including licensees and nuclear suppliers.
- Utilizing licensee and nuclear supplier personnel, NEI will facilitate assessment of ILAC processes, including implementation of international and domestic accrediting body qualifications and laboratory certifications.
- NEI plans to work with ILAC to assure its processes support the commercial-grade dedication activities of NEI member licensees and suppliers.
- NEI membership in ILAC provides NEI members electronic access to ILAC reports, Accrediting Body certifications, laboratory certifications, and notifications of degraded or unsatisfactory performance.
- NEI member licensees and suppliers may review ILAC certification and supporting documentation as input to commercial-grade dedication activities. End users would be responsible for reviewing information and assuring appropriate use in dedication activities.
- Continuous monitoring of laboratory performance by the end user is accomplished through end-user membership in NEI, which facilitates information exchange through its ILAC membership and participation in annual ILAC meetings.
- NEI plans to submit a document in 2012 for NRC endorsement that provides guidance on use of the ILAC process during commercial-grade dedication.
- NRC endorsement of the NEI document would provide the basis for licensees and nuclear suppliers to update their 10 CFR Part 50, Appendix B, Quality Assurance Programs to reflect use of commercial laboratory certifications during commercial-grade dedication.

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We appreciate the input and support from the NRC staff in developing this proposal. The industry and NRC actions outlined above will increase the efficiency, quality and regulatory certainty associated with commercial-grade dedication of calibration and testing services. Due to the significant and continuing commitment of industry resources associated with ILAC membership and participation, we request that the NRC consider this proposal and provide a written response confirming its acceptability.

To facilitate NEI participation in the 2011 ILAC Annual Meeting coming up this November, your response is requested within 30 days.

If you have any questions regarding the ILAC proposal, please contact me or Mark Harvey at (910) 441-8866; [mwh@nei.org](mailto:mwh@nei.org)).

Sincerely,



Russell J. Bell

c: Mr. John Tappert, NRO/DCIP, NRC  
Mr. Yamir Diaz-Castillo, NRO/DCIP/CQVA, NRC  
Mr. Victor E. Hall, NRO/DCIP/CQVB, NRC  
Mr. Juan D. Peralta, NRO/DCIP/CQVA, NRC  
Mr. Timothy J. Frye, NRO/DCIP/CAEB, NRC  
Mr. William F. Burton, NRO/DNRL/DDIP/NR, NRC  
NRC Document Control Desk