

MARCUS R. NICHOL

Senior Project Manager, Quality Issues and
Licensing Actions

1201 F Street, NW, Suite 1100
Washington, DC 20004
P: 202.739.8131
mrn@nei.org
nei.org



April 29, 2014

Mr. Joseph Colaccino
Chief, Policy Branch
Division of Advanced Reactors and Rulemaking
Office of New Reactors
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Submittal of NEI 14-05, Revision 0, *Guidelines for the Use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services*

Project Number: 689

Dear Joseph:

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)¹ submits the attached NEI 14-05, *Guidelines for the Use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services*, Revision 0 for NRC review and endorsement. This guidance provides an approach to utilize accreditation by signatories to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement (MRA) as part of a purchaser's commercial grade dedication of laboratory services. The net result will be a substantial reduction in duplication of effort for qualifying these suppliers across the industry, while ensuring that the applicable requirements for commercial grade dedication continue to be met.

The NRC's initial recognition of accreditation by ILAC MRA signatories is documented in a 2005 Safety Evaluation Report (SER) in response to a request by Arizona Public Service (APS). The NRC's current recognition is limited to laboratory calibration services accredited by specific U.S. Accreditation Bodies. Our guidance expands on the approach taken by APS and others following the NRC's endorsement in the SER to include calibration and test laboratories accredited by international and domestic ILAC MRA signatories. The

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

Mr. Joseph Colaccino

April 29, 2014

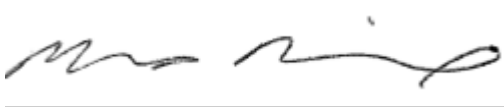
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approach also includes continued oversight of the ILAC process by the U.S. nuclear industry to assure that the ILAC process continues to be an acceptable alternative to performing surveys for commercial grade dedication.

In developing this guidance, NEI's ILAC Task Force, which include members from the Nuclear Procurement Issues Committee, evaluated the ILAC requirements and procedures versus the NRC requirements, guidance and U.S. nuclear industry practices. We also observed peer evaluations of international accreditation bodies, assessments of calibration and testing laboratories, training for peer evaluators, and ILAC accreditation meetings. Based upon these observations, we concluded that the ILAC process is essentially equivalent to NRC-accepted practices for performing commercial grade surveys and can be used in accordance with the NEI guidance in lieu of commercial grade surveys to support commercial grade dedication of laboratory calibration and test services.

We appreciate the NRC's consideration of the guidance and would welcome the opportunity to meet and discuss the guidance in more detail to assist the NRC in its endorsement process. If you have any questions or require additional information, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Marcus Nichol", enclosed in a thin black rectangular border.

Marcus Nichol

Attachment

c: Mr. Michael E. Mayfield, NRO/DARR
Mr. Michael C. Cheok, NRO/DCIP
Mr. Edward H. Roach, NRO/DCIP/MVIB, NRC
Mr. Yamir Diaz-Castillo, NRO/DCIP/MVIB, NRC
Mr. Dennis J. Galvin, NRO/DARR/APOB, NRC
NRC Document Control Desk