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August 28, 2014

Mr. Joseph Colaccino
Chief, New Reactor Rulemaking and Guidance 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 1, *Guidelines for the Use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services*

Project Number: 689

Dear Mr. Colaccino:

On July 22, 2014, the U.S. Nuclear Regulatory Commission (NRC) requested additional information to continue portions of your review of 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. 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.

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)¹ submits responses to the NRC questions, and Revision 1 to NEI 14-05 that reflects changes resulting from the NRC's questions. We believe that these responses will allow the NRC to complete its review and endorse the guidance as an acceptable method for using accreditation by ILAC MRA signatories in lieu of commercial grade surveys.

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

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.

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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 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.

We appreciate the NRC's consideration of the guidance and look forward to timely endorsement. If you have any questions or require additional information, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Marcus Nichol". The signature is fluid and cursive, with a prominent loop at the end.

Marcus Nichol

Attachments

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