



# THE NATIONAL BOARD

OF BOILER AND PRESSURE VESSEL INSPECTORS

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October 11, 2016

Ms. Maureen E. Wylie  
Chief Financial Officer  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Fee Exemption Request for Recognition of NR and NR-VR National Board Accreditation Program

Dear Ms. Wylie:

The National Board is an organization, composed of chief inspectors for the states and cities of the United States and provinces of Canada, organized in 1919 for the purpose of promoting safety to life and property by maintaining **uniformity** in post-construction activities of pressure-retaining items.

On September 9, 2016, the National Board of Boiler and Pressure Vessel Inspectors submitted a request to have Nuclear Regulatory Commission (NRC) formally recognize and communicate to the Nuclear Industry the availability of the National Board **NR** Accreditation Program. This program provides requirements for performing repair/replacement activities to nuclear components and systems.

The **NR** Accreditation Program follows the same requirements as the American Society of Mechanical Engineers (ASME) Accreditation Program for N Stamp Holders described in ASME Section III, Subsection NCA which is recognized by the NRC as supported by the issuance of Information Notice No. 86-21, *Recognition of American Society of Mechanical Engineers Accreditation Program for N Stamp Holders*, and required by 10 CFR 50.55(a).

However, the scope of the ASME Accreditation Program for N stamp holders is limited to the construction of nuclear pressure equipment prior to installation and operation. The scope of the National Board **NR** Accreditation Program imposes the same quality program requirements after construction is completed (post-construction activities).

The National Board proposes the following for NRC consideration:

- 1) Recognize the National Board **NR** Accreditation Program for performing post-construction activities (repairs/replacement) to nuclear components and systems, along with the **NR-VR** scope extension for repairs to pressure relief devices in nuclear service. Program activities include inspecting, certifying, documenting and stamping repair or replacement activities in accordance with a written accredited quality assurance program, once new construction conformity assessment requirements are completed. Those activities can be performed either before fuel loading or during subsequent nuclear plant operations, and satisfy both Title 10 Code of Federal Regulations (CFR), Part 50 and Part 52 regulatory licensing provisions.
- 2) Support the use of the **NR** accreditation program as an acceptable quality assurance program for the nuclear industry to ensure conformity assessment of code and regulatory requirements as identified and required by 10 CFR Part 52.

The National Board requests that the NRC's review of the National Board **NR** Accreditation Program be granted a fee waiver pursuant to the provisions of 10 CFR 170.11, "Exemptions." In paragraph (a), this regulation states that no application fees, license fees, renewal fees, inspection fees, or special project fees shall be required for:

- (1) A special project that is a request/report submitted to the NRC



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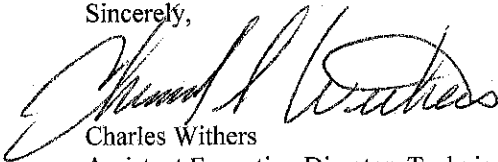
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(ii) When the NRC, at the time the request/report is submitted, plans to use the information in response to an NRC request from the Office Director level or above to resolve an identified safety, safeguards, or environmental issue, or to assist the NRC in generic regulatory improvements or efforts (e.g., rules, regulatory guides, regulations, policy statements, generic letters, or bulletins).

This fee exemption request meets the requirements of 10 CFR 170.11(a)(1)(ii) as part of FY2016 final fee rule, in that it is a means of exchanging information between industry organizations and the NRC for the specific purpose of supporting the NRC's generic regulatory improvements or efforts. In this case, the generic regulatory improvement ensures quality assurance and conformity assessment of code and regulatory requirements as identified and required by 10 CFR Part 50 and 52. Industry benefit from the National Board NR Accreditation Program can be realized without NRC endorsement; however, the NRC benefits from having endorsed guidance by the uniform application of a recognized accredited program by the National Board, an American National Standards Institute (ANSI) accredited Standards Developing Organization (SDO). The submittal of this request satisfies 10 CFR 170.11(a)(13).

Should you have any questions, please do not hesitate to contact me.

Sincerely,



Charles Withers  
Assistant Executive Director, Technical