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General Comment

Current internal labs in the utility industry should be required to go through the same requirements that external calibration facilities have to when calibrating and testing equipment for nuclear plants. It's not economically fair for the external calibration labs to pay for and go through the rigorous audits and try to compete for business when internal laboratories are not required to pay for this expensive certification. The NRC should hold all calibration facilities equally accountable for work being done for nuclear plants by qualified technicians and this petition puts every calibration business on an equal playing field. Some of the external calibrations labs even require their technicians and managers to be ASQ certified for the job they perform. This should be mandatory for all businesses when calibrating and testing for nuclear plants to ensure uniform, basic knowledge and skills prior to employment and continuing education each year after to satisfy certification renewal. All calibration facilities doing work for nuclear plants should be required to have their program and employees certified and accredited under the same set of requirements.