

No action 6
3/12/81

DRAFT PRELIMINARY VALUE IMPACT
STATEMENT FOR
REVISION OF 10 CFR 50
LABORATORY ACCREDITATION

1. PROPOSED ACTION

1.1 Description

Amend NRC regulations to add the requirement that utilities, operating or constructing a nuclear power plant, have the qualification testing of safety-related equipment performed by a laboratory accredited, through a program acceptable to the NRC, to perform those tests.

1.2 Need

because of
The Commission ~~is~~ concerned about the quality of the qualification testing of safety-related equipment. ~~They requested that the staff look into the matter.~~ The Office of Inspection and Enforcement (IE) developed an outline for a program to independently verify equipment qualification. Sandia Laboratories was contracted to perform a study on the various ways of independently verifying equipment qualification. The alternative proposed by Sandia Laboratory were considered to ^{be} expensive, in dollars, and manpower ^{and} of the time to implement ^{alternatives} them and obtain results was ^{considered to be} too long.

In Commission Paper, SECY-80-319, the Office of Inspection and Enforcement proposed a program which included a laboratory accreditation program. The laboratory accreditation program would reduce the manpower requirements to an acceptable level and increase the level of confidence that equipment is properly qualified. On September 16, 1980, in a memo from the Commission to the EDO, the Commission approved the initiation of a laboratory accreditation program.

1.3 Value/Impact

1.3.1 NRC

Using a third party accreditation program, the only impact to the NRC would be the manpower necessary to initiate the program. The use of the

for what, is Sandia alternative or the present challenge?

program would greatly reduce the number of manhours spent in verifying equipment qualifications. The value far out weighs the impact.

1.3.2 Other Government Agencies

The Department of Commerce could be impacted if the National Voluntary Laboratory Accreditation Program (NAVLAB) was selected to run any portion of the program. Additional manpower would be needed to run the program.

Other government agencies that use similar laboratory services could benefit if they selected a laboratory based on the fact it was accredited, rather than perform separate audits to determine acceptability.

1.3.3 Industry

Purchasers of laboratory services usually perform some form of audit and observe some of their equipment being tested. Given the large number of purchasers this amounts to a lot of duplicated effort. A laboratory accreditation program would provide the same level of confidence ^{with reduced} ~~as the audits and the~~ inspections. ~~At the same time, the program would reduce the manhours expended by the purchasers and the laboratories by eliminating the redundant audits and inspections.~~

1.3.4 Public

The level of confidence the public has in the industry and the regulatory bodies would increase if an accreditation program is implemented.

1.4 Decisions on the Proposed Action

The Commission has requested that laboratory accreditation program be initiated. The Equipment Qualification Branch in NRR has proposed a schedule for rulemaking on laboratory accreditation, which includes an Advance Notice of Rulemaking, a Proposed Rule and an Effective Rule. Rulemaking should be initiated.

Why? What about value of all public of better qualified equipment?

2. TECHNICAL APPROACH

2.1 Technical Alternatives

There are three alternatives:

1. A government accreditation program (NAVLAP)
2. An industry accreditation program - each company using its own program
3. A professional societies accreditation program ^{such as} (American Society of Mechanical Engineers - ASME, Institute of Electrical and Electronic Engineers - IEEE, American Society of Metals - ASM, American Association for Laboratory Accreditation-AALA)

2.2 Discussion

The Office of Inspection and Enforcement (IE) asked IEEE if they would consider developing and managing a laboratory accreditation program covering laboratories that qualify safety-related electrical equipment. At a meeting between IEEE and IE, held on February 14 and 15, 1981, IEEE agreed to undertake the development of a laboratory accreditation program. The program would initially cover the accreditation of laboratories providing environmental qualification of electrical equipment.

As other standards become available more subjects will be considered for inclusion under the rule. Areas being considered for future inclusion are nondestructive testing, destructive testing, calibration and mechanical equipment. These accreditation programs would be developed and administered by organizations with expertise in the given area.

2.3 Decisions on Technical Alternative

IEEE will develop and administer the laboratory accreditation program covering the qualification of safety-related electrical equipment.

3. PROCEDURAL APPROACH

3.1 Procedural Alternatives

The Commission approved SECY Paper 80-319, which proposed that a rule requiring accreditation be developed. The alternatives are to issue a proposed rule or an advance notice of rulemaking (ANR).

No! See Gregg.

3.2 Discussion

Because the accreditation standard has not been written yet it is not possible to issue a proposed rule. However, it is desirable to let industry and the public know that the NRC intends to require equipment be qualified by an accredited laboratory. The issuance of an ANR would notify the industry and the public of the intended action and allow them a chance for participation early in the procedure. It would also provide an opportunity to get information for the value/impact statement.

3.3 Decision

An Advance Notice of Rulemaking should be issued.

4. STATUTORY CONSIDERATIONS

4.1 NRC Authority

The Commission has the authority to initiate rulemaking, pursuant to Sections 83 and 166 of the Atomic Energy Act, as amended.

4.2 Need for NEPA Assessment

The proposed action is not a major action as defined by 10 CFR 51.5(3) and does not require an environmental impact statement.

5. RELATIONSHIP TO OTHER EXISTING OR PROPOSED REGULATIONS OR POLICIES

This ANR is part of a program that consists of three rulemaking actions. The Commission has requested that rulemaking be initiated on the following subjects:

1. Environmental Qualification of Safety-Related Electrical Equipment
2. Environmental Qualification of all Safety-Related Equipment
3. Accreditation of Laboratories Performing Qualification Testing

The first rule will be issued as soon as possible. The second rule can not be made effective until the supporting standards have been developed. The rule on accreditation of laboratories performing environmental qualification testing will be issued as soon as possible. Other areas requiring accreditation will be added as the necessary standards are developed.

6. SUMMARY AND CONCLUSIONS

An advance notice of rulemaking will be prepared.

ADVANCED NOTICE OF PROPOSED RULEMAKING - LABORATORY ACCREDITATION

Prepare Prelim. Value/Impact Statement & TIF	2/6/81
TIF Approved	3/13/81
Initial Draft Complete	3/20/81
Final Division Review Complete	4/3/81
Resolution of Comments Complete	4/17/81
Office Concurrence	4/24/81
Submitted to EDO/Commission	5/5/81
ANR Published in Federal Register	6/23/81

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