

MFFFNPEM Resource

From: MFFFHearingFile Resource
Sent: Monday, August 27, 2012 4:32 PM
To: MFFFNPEM Resource
Subject: FW: revised draft RAI

From: Tiktinsky, David
Sent: Monday, July 30, 2012 1:27 PM
To: Gwyn, Dealis W.
Cc: MFFFHearingFile Resource
Subject: revised draft RAI

This is a modification from previous drafts for discussion purposes.

Laboratory Analysis Services and Suppliers for Items whose Importance to Safety is Low

RAI-13

The MPQAP Revision 11 Justification for Change states that (for IROFS ranked as having low relative safety significance) "MOX Services may use laboratory services from supplier's, both domestic and foreign that are signatories to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Agreement (MRA)." ... "The NRC endorsed the use of this accreditation approach for calibration in lieu of audit or commercial grade survey in a letter to Palo Verde on September 28, 2005."

The revision justification also states that (for IROFS ranked as having low relative safety significance) that "These IROFS may be procured directly from suppliers based on certificates from nationally/internationally recognized independent accreditation organizations (such as UL or FM) unless the engineer determines that additional requirements are necessary. MOX Services will rely on the national/international recognition to establish accreditation organizations capability to perform the accreditation."

The NRC staff notes that the referenced letter to Palo Verde does not endorse the use of laboratory services from domestic and foreign suppliers that are signatories to the ILAC MRA. The NRC letter and answers to the Office of New Reactors Vendor Workshop provides only that the NRC finds acceptable the use of commercial calibration laboratories accredited by one of the following 6 domestic accrediting bodies: NVLAP, A2LA, IAS, ACLASS, Perry Johnson, or LAB.

Please revise the submittal to provide a more focused scope that will align with the NRC's approved approach for the use of domestic calibration suppliers possessing accreditation from one of the six bodies identified above or provide specific information to support an expanded scope of (1) procurement directly from suppliers based on certificates from nationally/internationally recognized independent accreditation organizations and (2) laboratory services from supplier's, both domestic and foreign that are signatories to the ILAC MRA.

Additional information needs to be provided in the justification to support the expanded scope. Some examples that may help the staff understand the requested changes for suppliers include:

- (a) identification of the specific accrediting body to be used; (b) IROFS and/or IROFS categories or services that would be procured; (c) description of accrediting body's accreditation (e.g., FM, UL) program for accepting or qualifying suppliers (this description should contain an analyses of the accreditation program as compared to the applicable MPQAP provisions including addressing

differences and providing the rationale why these differences are acceptable and d) a description of MOX Services review and oversight of an accrediting body of suppliers, limitations of their use, etc.

Some examples for calibration services include:

(a) A description of the ILAC/MRA calibration program (this description should contain an analyses of the calibration program as compared to the applicable MPQAP provisions, including addressing differences and providing the rationale why these differences are acceptable), and (b) a description of MOX Services review and oversight of an accrediting body of calibration services, limitations of their use, etc.

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