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February 19, 2014

Mr. Michael C. Cheok
Director
Division of Construction Inspection and Operational Programs
Office of New Reactors
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Update on Industry Proposal for Expanded Use of Internationally Accredited Calibration and Testing Laboratories

Project Number: 689

Dear Mr. Cheok:

The purpose of this letter is to provide an update to the NRC on the industry's efforts to develop a proposal to expand the NRC's current acceptance of third-party accreditation of domestic calibration laboratories for the purposes of commercial grade dedication. The NRC currently accepts third-party accreditation of domestic calibration laboratories in lieu of performing a survey or in-process surveillance. As outlined in our letter to Ms. Laura Dudes dated September 16, 2011, we seek to expand the acceptability of third-party accreditation to include both domestic and international calibration and testing laboratories accredited under the International Laboratory Accreditation Cooperative (ILAC).

Since 2011, we have focused on evaluating the ILAC accreditation process to validate proposed expanded credit for ILAC accreditation in the nuclear industry's commercial grade dedication of calibration and testing laboratory services. Our evaluations have included observing training for ILAC peer evaluators, observing accreditation review meetings, and observing peer evaluations and laboratory assessments.

Our observations of ILAC peer evaluations are especially important to our validation of the ILAC processes. The first of these observations occurred in November 2013, when we observed the peer evaluation of the Japanese Accreditation Body. We plan a second observation in March 2014 of the peer evaluation of the American Association of Laboratory Accreditation.

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These observations have also been used to compare the ILAC processes to the current practices of the Nuclear Procurement Issues Committee (NUPIC). From these we have concluded that ILAC practices are very similar to NUPIC practices and can be demonstrated to meet NRC regulations. We are working with ILAC to determine whether minor differences can best be addressed through enhancements to ILAC processes or through compensatory measures by the nuclear industry. We are also developing an approach to address on-going monitoring to assure that ILAC practices continue to meet the needs of the industry and the NRC.

We are developing guidance on use of ILAC accreditation to support the nuclear industry's commercial-grade dedication of laboratory calibration and testing services. We plan to complete this guidance after we observe the Spring peer evaluation, and to submit it for NRC review and endorsement in the second quarter 2014.

If you have any questions or require additional information, please contact Marc Nichol (mrn@nei.org; 202-739-8131) or me.

Sincerely,

A handwritten signature in black ink, appearing to read "RJB", with a stylized flourish at the end.

Russell J. Bell

c: Ms. Andrea D. Valentin, NRO/DCIP, NRC
Mr. Edward H. Roach, NRO/DCIP/MVIB, NRC
Mr. Yamir Diaz-Castillo, NRO/DARR/MVIB, NRC
NRC Document Control Desk