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To: james.harrison@ge.com
Cc: [Ortega-Luciano, Jonathan](#); [Prescott, Paul](#)
Subject: RAI for Review of Amendment to NEDO-11209-A, Rev. 12, "GE Hitachi Nuclear Energy Quality Assurance Program Description"
Date: Monday, April 11, 2016 1:48:17 PM

Jim- below is the request for information (RAI) that NRC staff discussed via telecom this afternoon with you and other GE individuals including your QA Programs Leader. We understand that you intend to revise your QAPD to address this RAI.

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General Electric Hitachi Nuclear Energy QAPD, draft changes to Revision 12, Part II, "QAPD Details," Section 7.10, "Commitment," provides a brief description of the requirements to be followed when procuring commercial-grade calibration services from a calibration laboratory.

Section 4 of NEI 14-05, "Guidelines for the Use of Accreditation in Lieu of Commercial-Grade Surveys for Procurement of Laboratory Calibration and Test Services," Revision 1, states, in part, "Purchasers that rely on the accreditation by ILAC signatories in lieu of commercial-grade surveys are required by 10 CFR Part 50, Appendix B to document this alternative method in their QA Program.... A Template for describing the use of the ILAC process in lieu of a commercial-grade survey in a Purchaser's QA Program is provided in Appendix A. Although a Purchaser is not required to use the Template in Appendix A, all of the actions and steps described in Appendix A need to be included in the Purchaser's QA Program." The staff's evaluation and endorsement of NEI 14-05, is documented in the "Final Safety Evaluation for Technical Report NEI 14-05, 'Guidelines for the Use of Accreditation in Lieu of Commercial-Grade Surveys for Procurement of Laboratory Calibration and Test Services,' Revision 1," (ADAMS No. ML14322A535), dated February 9, 2015. Additionally, the staff recently issued Regulatory Issue Summary (RIS) 2016-01, "Nuclear Energy Institute Guidance for The Use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services," (ADAMS No. ML15323A346), dated March 16, 2016. The RIS also reiterated the requirement to include all of the actions and steps in the QA Program.

The proposed change to NEDO-11209-A, Revision 12, does not address the requirements of Appendix A of NEI 14-05 as approved by the staff. Provide clarification on how General Electric Hitachi Nuclear Energy incorporates these requirements of Appendix A in its QAPD.

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