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January 14, 2020

Ms. Maureen E. Wylie
Chief Financial Officer
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Fee Exemption Request for Review Endorsement of NEI 14-05A, "Guidelines for the Use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services," Revision 1

Project Number: 689

Dear Ms. Wylie:

Nuclear utilities and their suppliers continued utilization of the International Laboratory Accreditation Cooperation (ILAC) process during commercial grade dedication of calibration and testing services beyond November 30, 2020 is contingent on the NRC's endorsement of NEI 14-05A, Revision 1. NEI¹, along with the Nuclear Procurement Issues Corporation (NUPIC) will be seeking the NRC's endorsement of NEI 14-05A, Revision 1. The purpose of this letter is to request that the NRC's review of NEI 14-05A, Revision 1 be granted a fee waiver pursuant to the provisions of 10 CFR 170.11.

NEI 14-05A Revision 1 represents the next step in an ongoing process. On April 16, 2019, the United States Nuclear Regulatory Commission granted provisional recognition of International Standard Organization/International Electrotechnical Commission (ISO/IEC) Standard 17025, "General Requirements for the Competence of Testing and Calibration Laboratories," 2017 Edition. The NRC letter indicated acceptance of ISO/IEC 17025:2017 is only applicable during the ISO designated three-year transition period which began on November 30, 2017 and ends on November 30, 2020.

NRC's acceptance of ISO/IEC 17025:2017 beyond the transition period will require revision to NEI 14-05A, "Guidelines for the Use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

Calibration and Test Services." ISO/IEC 17025:2005 served as the basis for NEI 14-05A, Revision 0 and ISO/IEC 17025:2017 serves as the basis of NEI 14-05A, Revision 1. NEI 14-05A, Revision 0 was previously endorsed by the NRC through Safety Evaluations dated February 9, 2015 and April 1, 2016. NEI 14-05A outlines the ILAC process which is the nuclear industry's method for acceptance of commercial calibration and testing services based on accreditation to ISO/IEC 17025.

NEI 14-05A Revision 1 meets the exemption requirement in 10 CFR 170.11(a)(1)(iii) in that it is "a means of exchanging information between industry organizations and the NRC...for the specific purpose of supporting ongoing NRC generic regulatory improvements or efforts." In this case, the generic regulatory improvement is the NRC's endorsement of a revision to an industry guideline which is based on an international standard which has been provisionally endorsed by NRC. Endorsement of NEI 14-05A, Revision 1 will permit nuclear utilities and their suppliers to continue to utilize the ILAC process during commercial grade dedication of calibration and testing services.

Please contact me should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Mark A. Richter". The signature is written in a cursive, flowing style.

Mark A. Richter

c: Earl Mayhorn, Ameren/NUPIC