



15-December-2021

Project Number: 99902080

US Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

**SUBJECT: NRC'S TELECOM RELATED TO THE QUALITY ASSURANCE PROGRAM
DESCRIPTION RAI NUMBER 9 RESPONSE FOR ATOMIC ALCHEMY'S
NON-POWER PRODUCTION AND UTILIZATION FACILITY**

REFERENCES: 1) Letter from Michael Balazik (USNRC) to Thomas Eiden (Atomic Alchemy Inc.), "Requests for Additional Information Related to the Quality Assurance Program Description Review for the Construction License Application for the Atomic Alchemy Inc. Non-Power Production Facility" (ADAMS Accession Package No. ML21228A040) dated August 31, 2021.

2) Atomic Alchemy Inc. Letter AAL-2021-008, "Atomic Alchemy's Response to NRC Questions Related to the Quality Assurance Program Description for Atomic Alchemy's Non-Power Production and Utilization Facility" (ADAMS Accession Package No. ML 21281A279) dated October 8, 2021.

In Reference 1, by letter dated August 31, 2021, the NRC requested additional information (RAI #9) to further support review of the Atomic Alchemy Inc. Quality Assurance Program Description Topical Report. In Reference 2, by letter dated October 8, 2021, Atomic Alchemy provided its response to the NRC's corresponding Request for Additional Information.

During the bi-weekly call (October 26, 2021) with the NRC, it was expressed that the NRC staff would like a further discussion regarding Atomic Alchemy's response. On November 4, 2021, that call was held.

During the November 4, 2021 call, the NRC did not provide a regulatory or technical justification for the basis of its opposition to the Atomic Alchemy RAI response. Instead, NRC Staff revisited decisions which should have already been accepted by the NRC via prior RAI responses and already incorporated into the preliminary SER. The focus and scope of the call should have strictly remained on the subject of RAI #9, that is, whether or not Atomic Alchemy had included adequate provisions in its QAPD to ensure that vendor programs for providing commercial grade services were correctly accredited to ISO 17025:2017 in lieu of a survey. The answer to that question is YES.

As noted in the RAI #9 response, the alternative proposed in the QAPD Part VII (which is the recommended correction to the errata in NQA-1-2017 by a Subject Matter Expert on

the ASME Subcommittee on Engineering and Procurement Processes (SCEPP) for NQA-1) and the administrative controls for developing procurement specifications for obtaining commercial grade services, that were already previously described in our QAPD, both adequately address the issue raised by RAI #9.

As an aside, Atomic Alchemy would like to express its dissatisfaction with the demeanor displayed by some of the NRC staff during this call.

There are no commitments made in this submittal.

If there are any questions or a need for additional information, please contact Mr. Michael Grochowski at regulatory@atomicalchemy.us.

Sincerely,

Thomas Eiden
CEO, Atomic Alchemy Inc.

TE/mjg

CC:

Nuclear Regulatory Commission:

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