December 19, 2007

Mr. Keith Greenaway
President/CEO
ACLASS Accreditation Services
2009 North 14th Street, Suite 502
Arlington, VA 22201

SUBJECT: REPLY TO YOUR LETTER DATED SEPTEMBER 26, 2007, SEEKING AGENCY ASSISTANCE IN ACCEPTING ACLASS ACCREDITATION SERVICES

Dear Mr. Greenaway:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your letter dated September 26, 2007. You request that NRC provide assistance in accepting ACLASS Accreditation Services (ACLASS) as an acceptable body for the accreditation of commercial calibration laboratories as stipulated in American National Standards Institute/International Organization for Standardization/International Electrotechnical Commission (ANSI/ISO/IEC) 17025, "General Requirements for the Competence of Testing and Calibration Laboratories." You state that ACLASS accreditations are equivalent to those accreditations issued by the National Voluntary Laboratory Accreditation Program (NVLAP) and the American Association for Laboratory Accreditation (A2LA), which the NRC does accept.

On September 28, 2005, the NRC approved a request from Arizona Public Service Company (APS), in accordance with the regulations in Section 50.54(a)(4) of Title 10 of the *Code of Federal Regulations* (10 CFR), which proposed a change to the Quality Assurance Program (QAP) for the Palo Verde Nuclear Generating Station (PVNGS). The proposed change provided for use of accreditation of commercial-grade (as defined by 10 CFR Part 21, "Reporting of Defects and Noncompliance") calibration services by a nationally-recognized accrediting body, using procedures consistent with international standards and guidelines, specifically those found in ANSI/ISO/IEC 17025. In its QAP change, APS stated that nationally-recognized accrediting bodies include NVLAP and other accrediting bodies recognized by NVLAP through a Mutual Recognition Arrangement (MRA). The staff understood this statement to include other accreditation bodies accepted as signatories to the International Laboratory Accreditation Cooperation (ILAC) MRA.

You also assert that current NRC policy stipulates NVLAP and A2LA as the only acceptable accreditation bodies. Each nuclear power plant licensee has the responsibility to decide which suppliers to select, approve, and maintain. The NRC discussed NVLAP and A2LA in the safety evaluation (SE) for APS only in the context of NRC's overall approval of the QAP changes to PVNGS QAP. This was not an endorsement or approval of such organizations, only recognition that the NRC finds the NVLAP and A2LA accreditation programs to be acceptable. As such, the staff concluded the following: (1) both accreditation bodies provide an acceptable alternative to APS's qualification of commercial-grade calibration service suppliers, and (2) the PVNGS QAP,

as described in Section 17 of the APS Updated Final Safety Analysis Report, continues to satisfy the requirements of Appendix B to 10 CFR Part 50, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants." In the SE, the staff concluded that both NVLAP and A2LA provide alternatives to the methods used by APS to qualify suppliers of commercial-grade calibration services. At the time, the NRC limited its review and approval of the requested QAP changes to NVLAP and A2LA because both organizations were domestic signatories (full members) to the ILAC MRA. Since ACLASS became a signatory on September 14, 2006, almost 1 year after the issuance of the staff's SE, the staff did not consider ACLASS in its review.

The staff recognizes that ACLASS now is a domestic signatory to the ILAC MRA. Additionally, on December 13, 2007, the NRC met with ACLASS staff to understand how ACLASS accreditations are equivalent to the accreditations provided by NVLAP and A2LA. Based on our understanding of the ACLASS accreditation process and your current status as an ILAC MRA signatory, the staff considers ACLASS to be another alternative to the methods used by licensees to qualify commercial-grade calibration service suppliers.

Should you have any questions, please contact Dale Thatcher at (301) 415-3260.

Sincerely,

/RA/

Patrick L. Hiland, Director
Division of Engineering
Office of Nuclear Reactor Regulation

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Patrick L. Hiland, Director
Division of Engineering
Office of Nuclear Reactor Regulation

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