

April 22, 2008

Mr. R. Douglas Leonard, Jr.
Managing Director
Laboratory Accreditation Bureau
11627 Coldwater Road, Suite 101
Fort Wayne, Indiana 46845

SUBJECT: REPLY TO YOUR LETTER DATED FEBRUARY 29, 2008, SEEKING
ASSISTANCE IN ACCEPTING LABORATORY ACCREDITATION BUREAU

Dear Mr. Leonard:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your letter dated February 29, 2008. You request that NRC provide assistance in accepting Laboratory Accreditation Bureau (L-A-B) as an acceptable accreditation body (AB) 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 L-A-B accreditations are equivalent to those accreditations issued by the National Voluntary Laboratory Accreditation Program (NVLAP); the American Association for Laboratory Accreditation (A2LA); and ACLASS Accreditation Services, whose programs are recognized by the NRC.

By way of background, 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 AB using procedures consistent with international standards and guidelines, specifically those found in ANSI/ISO/IEC 17025. In its QAP change request, APS stated that nationally-recognized ABs include NVLAP and other ABs recognized through a Mutual Recognition Arrangement (MRA). The staff understood this statement to include other ABs accepted as signatories (full members) to the International Laboratory Accreditation Cooperation (ILAC) MRA.

Although the NRC recognizes that ABs provide alternatives to the methods used by licensees to qualify suppliers of commercial-grade calibration services, 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 intended as an endorsement or approval of such organizations, only recognition that the NRC finds the NVLAP and A2LA accreditation programs for calibration services to be acceptable. As such, the staff concluded the following: (1) both accreditation programs constitute an acceptable alternative to APS's provisions for qualification of commercial-grade calibration services provided that the bases of the NRC approval are applicable to the licensee's facility, 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." At the time, the NRC limited its review and approval of the requested QAP changes to NVLAP and A2LA because both organizations were the only U.S.-based signatories to the ILAC MRA. Subsequent to the issuance of the SE, the NRC has also extended its recognition to the commercial calibration laboratory accreditation program of ACLASS Accreditation Services, which became another U.S.-based signatory to the ILAC MRA.

The staff recognizes that L-A-B became a U.S.-based signatory to the ILAC MRA on December 6, 2007. Additionally, on February 20, 2008, the NRC met with L-A-B and the other four U.S.-based ABs to discuss the commercial calibration laboratory accreditation process through ILAC. Based on our understanding of this process, and your current status as a U.S.-based signatory to the ILAC MRA, the NRC considers L-A-B's accreditation program to be another acceptable 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
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