

January 13, 2010

Tracy Szerszen
President/Operations Manager
Perry Johnson Laboratory Accreditation, Inc.
26555 Evergreen, Suite 1325
Southfield, MI 48076

SUBJECT: REPLY TO YOUR LETTER DATED NOVEMBER 16, 2009, SEEKING ASSISTANCE IN ACCEPTING PERRY JOHNSON LABORATORY ACCREDITATION, INC.

Dear Ms. Szerszen:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your letter dated November 16, 2009. You requested that NRC accept Perry Johnson Laboratory Accreditation, Inc. (PJLA) as an acceptable accreditation body (AB) for the accreditation of commercial calibration laboratories as stipulated in International Organization for Standardization/International Electrotechnical Commission (ISO/IEC) 17025, "General Requirements for the Competence of Testing and Calibration Laboratories." You stated that PJLA accreditations are deemed as competent as other ABs whose commercial calibration 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, in lieu of a supplier audit, commercial-grade survey, or in-process surveillance, using procedures consistent with international standards and guidelines, specifically those found in ISO/IEC 17025. In its proposed change to the QAP, APS stated that nationally-recognized ABs included the National Voluntary Laboratory Accreditation Program (NVLAP) and others recognized by NVLAP through a Mutual Recognition Arrangement (MRA). The staff understood this statement to include other U.S.-based ABs accepted as signatories (full members) to the International Laboratory Accreditation Cooperation (ILAC) MRA.

In the safety evaluation (SE) for the proposed change, the staff discussed NVLAP and the American Association for Laboratory Accreditation (A2LA) only in the context of NRC's overall approval of the APS request. This was not an endorsement or approval of such organizations, only recognition that the NRC finds their accreditation programs for calibration services to be acceptable. It should be noted that such recognition is limited to commercial calibration services and does not include testing. 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 acceptable to the licensee's facility,

and (2) the PVNGS QAP, as described in Section 17 of the 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." The staff limited its review and approval of the proposed QAP change to NVLAP and A2LA since both organizations were the only U.S.-based signatories to the ILAC MRA at the time of the staff's review. Since then, the NRC has extended recognition to the commercial calibration laboratory accreditation programs of ACLASS Accreditation Services, Laboratory Accreditation Bureau, and the International Accreditation Service, Inc., which all became U.S.-based signatories to the ILAC MRA subsequent to the issuance of the staff's SE.

In conclusion, based on our understanding of the ILAC accreditation process, and PJLA's status as a U.S.-based signatory to the ILAC MRA, the NRC considers PJLA 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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