

May 18, 2011

MEMORANDUM TO: John W. Lubinski, Acting Director  
Division of Component Integrity  
Office of Nuclear Reactor Regulation

FROM: Robert O. Hardies, Senior Level Advisor **/RA/**  
Division of Component Integrity  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF CATEGORY 2 PUBLIC MEETING BETWEEN THE  
U.S. NUCLEAR REGULATORY COMMISSION AND INDUSTRY  
REPRESENTATIVES TO DISCUSS THE PROGRESS ON THE  
INDUSTRY'S BURIED PIPING AND UNDERGROUND PIPING AND  
TANKS INTEGRITY INITIATIVES

On March 30, 2011, the Nuclear Regulatory Commission (NRC) staff held a Category 2 public meeting with representatives from the Nuclear Energy Institute (NEI), the Electric Power Research Institute, the Institute for Nuclear Power Operations, the American Society of Mechanical Engineers, NACE International (formerly known as the National Association of Corrosion Engineers) and other industry representatives at NRC Headquarters in Rockville, MD. This public meeting was one in an ongoing series of interactions between NRC staff, industry representatives and other stakeholders to understand the scope and schedule for industry activities related to degradation of buried piping. Minutes of previous meetings are available at Agencywide Document Access and Management System (ADAMS) Accession Numbers ML093070162, ML100810295, and ML103230366. A list of meeting attendees is enclosed. The meeting notice and agenda is available at ADAMS Accession Number ML110750348.

At the beginning of the meeting, NRC staff reviewed the status of the NRC's Buried Piping Action Plan (ADAMS Accession number ML110910462). The staff described the action plan activities, schedule for action, and reiterated NRC objectives with respect to buried piping: the safety-related function of buried piping continues to be maintained and any releases of radioactive material from buried piping remain well below NRC regulatory limits. Current regulations and industry activities remain compatible with those objectives. The staff will continue to monitor operating experience to verify the objectives are being met. The staff described a temporary instruction for NRC to perform inspections of licensee activities related to the Buried Piping and Underground Piping and Tanks Integrity Initiatives. Industry requested an opportunity to comment on the draft temporary instruction.

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On August, 18, 2010, the staff sent a letter to NEI (ADAMS Accession number ML1023002701), requesting information related to the Buried Piping Integrity Initiative. In its first presentation, NEI described the industry's information gathering activity in response to the letter and provided a preliminary summary of the results. NEI indicated they expected to issue a letter reply before the end of April, 2011. The industry provided updates on the implementation status of the current Buried Piping and Underground Piping and Tanks Integrity Initiatives and described the most recent revision of "Guidelines for the Management of Piping Integrity," NEI buried piping initiative administrative document NEI 09-14, which has been made available to the NRC (ADAMS Accession Number ML102660138).

The industry presented an overview of its "Reasonable Assurance Document" which describes a graded process that permits risk ranking and line grouping to inform the selection of indirect and direct inspection samples.

NACE International described ongoing activities in NACE Task Group 404, "Nuclear Buried Piping," to develop buried piping inspection, assessment and corrosion prevention standards optimized for nuclear power plant applications. ASME discussed the creation of "Task Group Buried Piping Inspection and Testing," to assess current industry status, activities and direction relative to buried component failures, testing and inspections. The task group may recommend changes to the ASME Boiler and Pressure Vessel Code.

NEI noted that the industry intended to begin an effort to coordinate the activities in the Underground Piping and Tanks Integrity Initiative and the Groundwater Protection Initiative. The coordination activities will begin with a workshop in the fall. NEI invited NRC to attend the workshop. NEI and INPO reviewed operating experience related to degradation of buried piping. Finally, EPRI reviewed the status of activities to develop non-destructive inspection techniques and processes for buried and underground piping. EPRI has published a report that identifies a broad variety of NDE methods and discusses their suitability for particular buried and underground piping applications. All presentations made at the meeting are available in ADAMS (Accession number ML110910452).

During the previous meeting, the following action items were recorded:

- 1) Staff requested to be provided with NEI 09-14 for information, which NEI provided on November 3, 2010.
- 1) Staff requested to be provided with the periodic Nuclear Strategic Issue Advisory Committee reports that summarize progress related to the piping and tanks initiatives, which NEI provided on March 7, 2011.
- 2) Staff requested to be provided with the new initiative, which NEI provided on September 27, 2010.
- 3) Staff requested a response to its August 18, 2010 letter to NEI. NEI plans to submit a response in late April or early May.
- 4) The staff will continue to work with industry to understand the risk ranking processes.
- 5) The staff inquired about how the transition is made from the risk ranking process to the inspection planning process. In particular, the staff is interested in learning whether consistent protocol will be established for selecting components or sections for inspection. The industry created its "Reasonable Assurance Document."

J. Lubinski

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During this meeting the following new action items were recorded:

- 1) Industry requested an opportunity to review the temporary instruction.
- 2) Industry indicated they would issue the response to the NRC information request in late April or early May.

The next meeting is tentatively planned for the third week of September, 2011.

Enclosure:

As stated

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- 2) Industry indicated they would issue the response to the NRC information request in late April or early May.

The next meeting is tentatively planned for the third week of September, 2011.

Enclosure:  
As stated

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**ADAMS PACAKGE ACCESSION NO.: ML11137A160**

**Summary: ML11137A171**

**Attend. List: ML11137A179**

<b>OFFICE</b>	NRR/DCI	NRR/DCI A DD)
<b>NAME</b>	RHardies	BThomas
<b>DATE</b>	05/16/2011	5/18/2011

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