



NEI - Buried Pipe Integrity Task Force

Underground Piping and Tanks Integrity Initiative

Inquiries and Interpretations

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NRC/Industry Meeting on Buried Pipe

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Today's Discussion

- Inquiry Processes
 - Submitting
 - Scope
 - Methods of Evaluation
- Communication
- Inquiries to Date

Inquiry Process

- How requests are submitted:
 - Individual Task Force Members
 - Industry Program Owners
 - Discussions at EPRI BPIG Meetings

Inquiry Process

- Scope of Inquiries
 - NEI 09-14
 - Inspection Planning Guidance Document
 - Subject Categories
 - Definitions
 - Technical Interpretations
 - Deviations

Inquiry Process

- Methods of Evaluation
 - Based on the complexity of the Inquiry
 - E-mail
 - Webcast
 - Reviewed by the NEI BPITF
 - Cycled for Concurrence
 - Consensus Agreement

Inquiries Communications

- 14 Inquiries and Interpretations
- Responses provided by NEI BPITF
- NEI post inquiries and responses on the NEI Buried Piping Web Board
 - Access the website to register
- Updates provided to the industry at BPIG Meetings
- New Inquiries in process

UPTI Inquiries to Date

Inaccessible Piping

- Can you credit guided wave and an engineering evaluation for piping with no access to excavate?
 - Not in conformance with the RA document, document the technical basis, but not a deviation from NEI 09-14

In Scope Tanks (2)

- Are tanks whose bottoms are in direct contact with the soil (but not below grade) in scope for the UPTI?
- Are above ground tanks that contain licensed material in the UPTI scope?
 - No, per the definition of NEI 09-14 these tanks are not in scope of UPTI.

Condition Assessment

- Can guided wave inspection be credited for starting condition assessment of high risk licensed material lines by 6/30/12?
 - No, NEI 09-14 and the Inspection Planning document require at least one direct examination.

UPTI Inquiries to Date

Pipe Encased in Concrete

- Is an inspection required by 6/30/2013 for a pipe encased in concrete to satisfy NEI 09-14 for buried piping containing licensed material?
 - No, by definition, this piping would be considered underground and the condition assessment is required by 6/30/2014.

Missed Piping

- Some small sections of piping were missed during scoping and not risk ranked by the required UPTI due date. This item was immediately entered into the corrective action program. Is this a deviation?
 - No, these conditions are considered discovery and do not meet the intent of a deviation.

Implementation of an Inspection or Condition Assessment Plan

- What is the definition of “start” for Inspection and Condition Assessment plans?
 - Start should include one direct examination of piping included in the inspection plans.

UPTI Inquiries to Date

Inspection and Examination Technologies (4)

- Is an APEC Survey considered a direct or indirect inspection?
 - This technique cannot be credited as direct examination or indirect inspection for the purpose of Initiative inspection planning.
- Can pulsed eddy current or remote field eddy current technology be used as a direct examination method?
 - If the Station can demonstrate that the capabilities meet their requirements for assessing condition they may be useable for specific situations.
- Can pressure testing be used as a direct inspection?
 - Hydrostatic testing is a potential exemption from inclusion in the inspection program and not considered a direct or indirect inspection.
- Do you need to perform direct examinations on medium risk piping
 - No, focus initial inspections on high risk ranked groups.

UPTI Inquiries to Date

Licensed Material

- What level of radioactivity is required to be classified as licensed material?
 - The determination of licensed material must be made by appropriate station personnel.

UPTI Teams

- Are Buried and Underground Piping Team meetings and composition, as described in the EPRI recommendations document, a requirement for the Initiative?
 - No, the proposed team meetings are not a requirement of NEI 09-14.

Adverse Inspection Findings Definition

- The INPO EPIX and NEI 09-14 definition of adverse inspection findings are different, so which governs for the Initiative?
 - The NEI 09-14 definition applies.



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