

November 2, 2009

MEMORANDUM TO: Michele G. Evans, 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 BURIED PIPING ISSUES

On October 22, 2009, a meeting was held between Nuclear Regulatory Commission (NRC) staff and industry representatives at the Legacy Hotel Meeting Center in Rockville, MD. The meeting was held to have the industry present its plans, programs and schedule for addressing degradation of buried piping. At the beginning of the meeting, NRC staff presented an overview of plans to evaluate regulations, codes and standards, and industry activities related to management of buried piping. The NRC slides presented at the meeting (ML092950074) are enclosed. A list of attendees is also enclosed (ML093030331).

After the presentation by the staff, the industry executive sponsor of the Electric Power Research Institute's (EPRI's) Equipment Reliability Action Plan Committee provided an overview of the industry presentations. The EPRI program manager for the EPRI Balance of Plant Corrosion Program described EPRI's Buried Piping Initiative, focusing on its history and organization and highlighting existing and planned research products. The utility leader of EPRI's Buried Pipe Integrity Group (BPIG) reviewed the function and performance of the BPIG, which he described as a forum for plants owners to share best practices and experiences, an interface with vendors, a research and development sponsorship body and a training organization. A representative from the Institute of Nuclear Power Operations (INPO) described INPO activities, including an operating experience review and a summary of utility review visit practices and observations.

A representative of NACE International, a standards organization that writes standards for corrosion prevention, mitigation and management, discussed the establishment of a standards group to address buried piping at nuclear power plants. The program manager for the EPRI Buried Piping Initiative concluded the day's presentations by introducing EPRI's buried piping program document, which provides recommendations for creating and maintaining a buried piping management program. The industry presentations are enclosed (ML093010478, ML093010444, ML093010463, ML093010474, ML093010485). The industry also provided a list of buried piping reports that EPRI has produced, which is enclosed (ML093030321).

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The staff intends to consider the information presented by the industry during its review of buried piping issues. Over the course of the meeting, the industry agreed to provide some additional discussion of the following questions. The additional discussion may be addressed in future meetings.

1) How are lessons learned from operating experience communicated to the designers of new reactors?

2) By what means might risk ranking software output be validated, and how important is validation of the output?

3) How will the guidance in the EPRI buried piping program guideline be extended to new materials that might be used in buried piping?

NRC staff requested that industry formally provide their schedule and plans for implementation of the buried piping integrity program, including defined program goals, extent of industry participation, and near term actions. The industry participants indicated they would provide, by December 1, a description of their progress in developing this information.

Enclosures:

1. NRC Staff Slides
2. List of Attendees
3. Industry Slides

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