

# History of Buried Piping Integrity Initiative

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## Initial Industry Activities

- Industry meeting in September to evaluate possible actions to address leakage from buried piping
- Why take action?
  - Public confidence is important for operation of existing plants and support for new plants
  - Important to effectively manage the asset
  - Important to maintain regulatory confidence
  - Unique aspects led to a separate Initiative

# Initiative Development

- Recommendations
  - NSIAC (Nuclear Strategic Issues Advisory Committee) Initiative to cover all buried piping
    - Procedures and oversight
    - Prioritization through risk ranking
    - Inspections
    - Asset management plan
  - Develop an NEI Guideline to supplement existing guidance and guide Initiative implementation

## Understanding an NSIAC Initiative

- NSIAC is an NEI standing committee whose members include the CNO of every utility operating a nuclear power plant in the US
- Initiative is a formal commitment between CNOs to follow a defined policy or plan of action
  - Regulatory credibility
- Passing an Initiative requires 80% approval
  - Buried Piping Integrity Initiative was approved unanimously (100%) on November 18, 2009

# Buried Piping Integrity Initiative

- Goal
  - Reasonable assurance of structural and leakage integrity of buried piping
- Scope
  - All NEI U.S. member utilities
  - All buried piping associated with each of their nuclear power plant sites.
- Expectations
  - Demonstrated by an improving trend in consequential leaks from buried piping across the industry.
  - Utilities will
    - Participate in the industry organizations that support and oversee implementation
    - Ensure that the buried piping activities are implemented at its plants
  - Industry organizations will cooperate in the manner described in this guideline.

# Subsequent Industry Activities

- Formed Buried Piping Integrity Working Group and Task Force
- Issued NEI Guideline (NEI 09-14)
  - Text of the Initiative
  - Intent of the Initiative
  - Roles and responsibilities
  - NSIAC report
- Developing guidance on “reasonable assurance” of buried piping integrity
- Continuing meetings with NRC to update Initiative status and industry activities

# Future Industry Activities

- Utilities
  - Implement Initiative
  - Support industry activities
- NEI
  - Continue NRC engagement
  - Periodic meetings of the Buried Piping Integrity Task Force to evaluate Initiative implementation and OE
  - Possible revision to NEI 09-14 to capture lessons learned
- EPRI
  - Support implementation through BPIG and BOPC
  - Develop inspection technology and resource materials
- INPO
  - Continue focus area



# Buried Piping Integrity Task Force

- Maria Korsnick, executive sponsor, Constellation
- Chris Burton, utility lead, FENOC
- Joe Abisamra, Entergy
- Bill Campbell, Constellation
- Ila Collins, TVA
- Rudy Gil, FPL
- Sharon Gray, SNC
- Richard Hall, Exelon
- Glen Schinzel, STARS
- Joe Sears, INPO
- David Smith, Duke
- Joe Terrell, Progress
- Bill Wendland, ANI
- Bo Clark, EPRI
- Jim Riley, NEI lead