

NEI 09-14
**“Guidelines for the Management of
Buried Piping Integrity”**

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Purpose of NEI 09-14

- Document the text of the Buried Piping Integrity Initiative
- Describe the intent of the Initiative
- Communicate roles and responsibilities of industry participants
- Describe industry reporting of implementation

Content of NEI 09-14

1. Background
2. Introduction
3. Industry Initiative on Buried Piping Integrity
4. Industry Roles and Responsibilities
5. Intent of the Buried Piping Integrity Initiative
6. References
- A. Report to NSIAC

1. Background

- Document's relation to the Buried Piping Integrity Initiative
 - Compliments the Ground Water Protection Initiative
- Describes the content of NEI 09-14

2. Introduction

- Reason for the Initiative
 - OE
 - Potential impact
- Intended outcome of the Initiative
 - Minimize unexpected failures
- Relation to EPRI document “Recommendations for an Effective Program to Control the Degradation of Buried Piping”

3. Industry Initiative

- Initiative goal
- Initiative Actions
- Scope: all buried piping on site
- Expectations
 - Improving leakage trends
 - Utility participation
 - Industry group cooperation

4. Industry Roles and Responsibilities

- Utilities
 - Implement
 - Report
 - Participate
- EPRI
 - NDE technology development
 - Venue for sharing OE
 - Report

4. Industry Roles and Responsibilities

- INPO
 - Regular plant evaluations
 - Communicate OE
 - Report
- ANI
 - Communicate recommendations
- NEI
 - Regulatory interface
 - Communicate
 - Coordinate
 - Report

5. Intent of the Initiative

- Procedures and Oversight
 - Lines of responsibility
 - Justifying deviations
 - Implementing the Initiative
 - Report
- Risk Ranking
 - Emphasis on piping containing radioactive fluids
 - Relationship to the Ground Water Protection Initiative

5. Intent of the Initiative

- Inspection plan
 - Considers
 - Piping design and condition
 - Inspection capabilities
 - Risk ranking
 - OE
 - Trends
 - Commitments
 - Use of sampling and engineering evaluations

5. Intent of the Initiative

- Plan implementation
 - Condition assessment
 - Most vulnerable locations
 - Combination of evaluation and inspection
- Asset Management Plan
 - Long term strategy

5. Intent of the Initiative

- Deviations
 - Technical justification developed and retained
 - Should provide basis for meeting the same objective
 - Should provide lifetime
 - Approved in accordance with procedures
 - Executive concurrence
 - Reported to NEI

A. Report to NSIAC

- Intent
 - Monitor Initiative implementation status
 - Identify deviations from Initiative elements
 - Trend leakage events
 - Monitor inspection technology development
- Results and industry OE are evaluated by Task Force and reported to NSIAC semi-annually

NEI 09-14 Revision

- Document the Underground Piping and Tanks Integrity Initiative
- Provide guidance on reasonable assurance
- Add definitions
- Communicate OE