

# **Underground Piping and Tanks Integrity Initiative**

**NEI 09-14, Rev 1**

March 30, 2011



# Initiative Revision

- Buried Piping Integrity Initiative applies to **all buried piping** that is in **direct contact with the soil**
- Experience indicated a need for expansion
  - Degradation of piping in vaults and tunnels can occur
    - VY leak came from piping in a vault
  - Buried Piping Integrity Initiative does not address tanks

## Revised Initiative

- NSIAC approved the Underground Piping and Tank Integrity Initiative in November 2010
  - Added scope
    - Underground piping and tanks whether or not they are in direct contact with the soil if they are outside of buildings and
      - Contain licensed radioactive material or
      - Are safety related
  - Includes new milestones

# Milestones

- Applicable to the added scope
  1. Procedures and oversight by December 31, 2011
  2. Prioritization by June 30, 2012
  3. Condition assessment plan by December 31, 2012
  4. Plan implementation by June 30, 2013
  5. Condition assessment of components containing licensed material by June 30, 2014
  6. Asset management plan by December 31, 2014

# NEI 09-14 Revision 1



## NEI 09-14 Revision

- NEI 09-14 rev 1 issued in January 2011
  - Adds text of the revised Initiative
  - Clarifies the intent of the Initiative through “shall” statements
  - Clarifies Initiative scope
  - Adds definitions
  - Enhances the process for justifying deviations
  - Adds expectations for communication of OE and deviations
  - New BPITF responsibilities

## NEI 09-14, Section 3: Initiative

- Documents the text of the Initiative
- Establishes the expectation for “shall” statements:

“Whenever the word “shall” is used in this document it indicates an action that is required under the Buried Piping and Tanks Integrity Initiative. If a plant cannot or will not implement any part of the Initiative (Sections 3.3.A and B) or a “shall” statement in this document, a justification for deviation from the Initiative shall be developed and processed in accordance with Sections 6.2.1 and 6.2.6.”

## NEI 09-14, Section 4: Definitions

- Accessible – routinely observed
- Environmentally hazardous – defined by environmental programs
- Underground tank – outside and sufficiently below grade such that a reasonable possibility exists that leakage will not be detected



# NEI 09-14, Section 5: Responsibilities

- Utility expectations
  - Implement the Initiative
  - Process justifications for deviation
  - Report implementation status to NEI
  - Communicate significant leakage and adverse inspection findings to NEI and Buried Pipe Integrity Group (BPIG)

# NEI 09-14, Section 5: Responsibilities

- Other responsibilities
  - EPRI
    - Venue for sharing OE and program experience
    - NDE development
    - Inspection results
  - INPO
    - Communicate OE
    - Focus area for plant evaluations

# NEI 09-14, Section 5: Responsibilities

- Other responsibilities
  - NEI
    - Regulatory interface
    - Task force and working group operations
    - Nuclear Strategic Issues Advisory Committee (NSIAC) report

# BPITF Responsibilities

- BPITF focus in 2011
  - NRC interface
  - Reasonable assurance document
  - “Enhanced Inspection and Environmental Monitoring Initiatives” coordination document
  - Monitoring OE
  - Initiative interpretation
  - Deviation assessment

## NEI 09-14, Section 6: Intent

- Initiative scope
  - Utility owned buried/underground piping and tanks within site boundaries
  - Inaccessible
  - Underground piping outside of the exterior surface of buildings
- Reasonable assurance goal

# NEI 09-14, Section 6: Intent

- Deviations
  - Verbatim conformance with the text of the Initiative and all “shall” statements in NEI 09-14 rev 1 is expected
  - Contact BPITF with questions on interpretation
  - Deviations must be justified
    - Technical reasons, not convenience
    - Approved by utility executive
    - Sent to NEI for review by the BPITF
      - General assessment, not approval
      - Evaluation of meeting Initiative intent
    - Utility will be informed of result
    - Deviations that do not meet the intent of the Initiative will be tracked in report to NSIAC



# NEI 09-14, Section 6: Intent

- Significant new operating experience: BPITF will
  - Disseminate information
  - Facilitate plant assistance if needed
  - Assess generic implications
  - Evaluate effect on guidance
- EPIX reports
  - Adverse inspection findings and significant leakage
  - Input to semi-annual report to NSIAC