

# Buried Piping and Tanks Interim Staff Guidance

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# Key Considerations

- Inspection categories based exclusively on materials may result in over-selection of low risk, non-safety related piping
- Cathodic protection OE review is not consistent with RG 1.188/NEI 95-10
- Cathodic protection
  - Adequate protection tied to the NACE standards for annual surveys and deviations greater than 90 days
  - Effect of not meeting survey criteria on categorization
  - Recommend considering corrective action process, repair activities and work management process

# Key Considerations

- Inspections should be based on per-site rather than per-unit
- Clarify inspection requirements for piping backfilled with controlled low strength material
  - Recommend top surface only
- Recommend buried component coatings be evaluated by a trained coatings inspector. For example:
  - EPRI Buried Pipe Condition Assessment and Repair and
  - EPRI Comprehensive Coatings Training Course

## Comment Status

- NEI letter requesting extension of comment period to April 23, 2012
  - Concurrent activities
- Status?