

April 25, 2012

MEMORANDUM TO: David W. Alley, Acting Chief
Piping and NDE Branch
Division of Engineering
Office of Nuclear Reactor Regulation

FROM: Robert O. Hardies, Senior Level Advisor **/RA/**
Division of Engineering
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF CATEGORY 2 PUBLIC MEETING BETWEEN THE
U.S. NUCLEAR REGULATORY COMMISSION AND INDUSTRY
REPRESENTATIVES TO DISCUSS THE PROGRESS ON THE
INDUSTRY'S BURIED PIPING AND UNDERGROUND PIPING AND
TANKS INTEGRITY INITIATIVES

On April 4, 2012, the Nuclear Regulatory Commission (NRC) staff held a Category 2 public meeting with representatives from the Nuclear Energy Institute (NEI), the Electric Power Research Institute, the Institute for Nuclear Power Operations, the American Society of Mechanical Engineers, NACE International (formerly known as the National Association of Corrosion Engineers) and other industry representatives at NRC Headquarters in Rockville, MD. This public meeting was one in an ongoing series of interactions between NRC staff, industry representatives and other stakeholders to understand the scope and schedule for industry activities related to degradation of buried piping. Minutes of previous meetings are available at Agencywide Document Access and Management System (ADAMS) Accession Numbers ML093070162, ML100810295, ML103230366, ML11137A171, and ML113210661. A list of meeting attendees is enclosed. The meeting notice and agenda is available at ADAMS Accession Number ML12079A167.

At the beginning of the meeting, NRC staff reviewed the status of the NRC's Buried Piping Action Plan, which is available at ADAMS Accession Number ML11332A122. The staff described the action plan activities, schedule for action, and reiterated NRC objectives with respect to buried piping. The staff described the temporary instruction (TI-182) for NRC to perform inspections of licensee activities related to the Buried Piping and Underground Piping and Tanks Integrity Initiatives. The staff indicated that SECY-12-0046, "OPTIONS FOR REVISING THE REGULATORY APPROACH TO GROUND WATER PROTECTION," which is available at ADAMS Accession Number ML12025A113 is currently under Commission consideration. This SECY paper was prepared in response to the staff requirements memorandum for SECY-11-0019.

Enclosure:
As stated

CONTACT: Robert O. Hardies, NRR/DE
(301) 415-5802

The industry provided updates on the implementation status of the current Buried Piping and Underground Piping and Tanks Integrity initiatives and discussed operating experience. The Electric Power Research Institute discussed progress and plans related to development and deployment of nondestructive examination equipment, processes and procedures.

EPRI described the Buried Piping Integrity Task Force effort to collect and evaluate inquiries related to the Buried Piping and Underground Piping and Tanks Integrity initiatives. Task force members or industry program owners may submit questions to the task force seeking clarification or interpretation of the intent of the initiatives. The task force publishes its interpretations on the Nuclear Energy Institute website. Following the EPRI presentation, INPO reviewed operating experience related to degradation of buried and underground piping.

The staff discussed changes to the Generic Aging Lessons Learned report, Revision 2, Aging Management Program XI.M41, "Buried and Underground Piping and Tanks." Interim staff guidance has been issued for public comment. The industry discussed the draft guidance and requested additional time to gather and process comments related to the interim staff guidance. The staff agreed to consider the request.

The American Society of Mechanical Engineers (ASME) discussed the status of Section XI buried piping activities, including plans and progress in the "Task Group Buried Component Inspection and Testing." This task group is developing potential changes to the ASME Boiler and Pressure Vessel Code to address inspection, testing, mitigation, repair, replacement and design of buried and underground piping. Task Group action item status was reviewed. Meeting attendees were encouraged to participate in the Task Group.

NACE International described ongoing activities in NACE Task Group 404, "Nuclear Buried Piping," to develop buried piping inspection, assessment and corrosion prevention standards optimized for nuclear power plant applications. The Task Group has issued a draft summary report. Once the final report is issued, the Task Group will be retired and a new Task Group will be established to develop standards for cathodic protection, coatings, materials selection, NDE and training related to buried piping at nuclear plants.

All presentations made at the meeting are available in ADAMS Accession number ML12094A004.

During the previous meeting the following action items were recorded, with the current status noted:

- 1) The NRC will continue discussions with industry related to determining a pre-initiative rate of occurrence of significant buried piping degradation events. (ongoing)
- 2) The NRC will continue discussion with industry related to recording criteria for tabulating, categorizing and sorting instances of degradation of buried and underground piping. (ongoing)
- 3) NEI will provide the NRC an opportunity to comment on the Groundwater/Underground Piping Initiative coordination document. A draft of this document was sent to the NRC on October 20, 2011. (complete)

During this meeting the following new action items were recorded:

- 1) The staff will provide examples of events in EPIX that could be categorized in more than one manner and will discuss recommendations for prioritizing categories.
- 2) The staff will discuss with NEI the possible uses of the "cause code" information being gathered in the EPIX database.
- 3) The staff will notify industry when SECY-12-0046 becomes publically available.
(completed after the meeting)

The next meeting was tentatively scheduled for September, 2012.

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| JStrishna | AShaikh | HGray | RHardies | MKing |
| WHolston | TKobetz | | | |

| | |
|--|--|
| Richard.hall@exeloncorp.com | searsjt@inpo.org |
| jhr@nei.org | jabisam@entergy.com |
| geschinzel@stpegs.com | Richard.hall@exeloncorp.com |
| dsmith@epri.com | dlamond@aesengineering.com |
| Gabriel.OGUNDELE@kinectrics.com | |

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| OFFICE | NRR/DE |
| NAME | RHardies |
| DATE | 4/ 25 /2012 |

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ATTENDANCE LIST

| <u>NAME</u> | <u>AFFILIATION</u> | <u>EMAIL</u> |
|------------------|--------------------|--|
| Robert Hadies | NRC | Robert.hardies@nrc.gov |
| David Alley | NRC | David.Alley@nrc.gov |
| Dan Lamond | AES | dlamond@aesengineering.com |
| Richard Hall | Exelon | Richard.hall@exeloncorp.com |
| Keith Hoffman | NRC | Keith.hoffman@nrc.gov |
| William Holston | NRC | William.Holston@nrc.gov |
| Mike Cheok | NRC | Michael.Cheok@nrc.gov |
| Richard Conatser | NRC | Richard.Conatser@nrc.gov |
| Bill Campbell | Constellation | William.Campbell@cengllc.com |
| Jason Grant | Constellation | Jason.Grant@cengllc.com |
| John Eastman | FIRSTENERGY | Jeastman@firstenergycorp.com |
| Jana Bergman | CWFC/Scientech | JBergman@curtisswright.com |
| Raj Auluck | NRC | Rajender.Auluck@nrc.gov |
| Cassandra Bitler | INPO | bitlercj@inpo.org |
| Viki Armentrout | Dominion | Viki.Armentrout@DOM.com |
| Ted Clark | Entergy | Tlvy@entergy.com |
| Bo Clark | EPRI | BHClark@epri.com |
| Ron LaVera | NRC | Ronald.LaVera@nrc.gov |
| Dylan Cimock | Exelon | Dylan.Cimock@exeloncorp.com |
| Albert Piha | Exelon | Albert.Piha@exeloncorp.com |
| Craig McWhorter | SNC | jcmcwhor@southernco.com |
| Jim Riley | NEI | jhr@nei.org |
| Joe Sears | INPO | searsit@inpo.org |
| Eric Blocher | STARS | eric.blocher@aps.com |
| Davis Smith | EPRI | dsmith@epri.com |
| Steve Kenefick | EPRI | SKenefick@epri.com |
| Matthew Golliet | Westinghouse | GollieM@westinghouse.com |

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