

# Revision 2 to NEI 09-14

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## NEI 09-14 Rev 2

- Issued revision 2 on November 21, 2012
- Revision includes:
  - Interpretations
  - Inspection planning document
  - Clarifications and editorial changes

# Definitions

- Adverse inspection finding
  - Results from an inspection that has been determined to require an indication from inspections that require immediate repair or a repair within one operating cycle
- Failure
  - Unexpected system leakage or loss of A breach in the structural or leakage integrity of a piping system or a tank.

## Changes Due to Interpretations

- Added the following to the definition of Licensed Material
  - This definition does not associate a specific level of radioactivity with licensed material because it is not possible to do so. A determination of what is licensed material in any situation must be made by radiation health personnel at each utility.

# Changes Due to Interpretations

- Added the following to the description of Initiative Scope (sec 6.1)
  - Pump casings (the column or pipe that surrounds the actual pump) that penetrate the floors of buildings are not within the scope of the Initiative even if the casing is in contact with the soil.
  - Some tanks that are safety related or contain licensed material sit at grade on a concrete donut shaped foundation with a center filled with compacted sand. The key factor that determines if such a tank is within the scope of the Initiative is the position of the bottom of the tank with respect to grade and the capability of detecting leaks by monitoring the tank level. If the tank contains licensed material, it is incumbent on the licensee to ensure that the tank is covered by either the Underground Piping and Tanks Integrity Initiative or the Ground Water Protection Initiative .

## Changes Due to Interpretations

- Added the following notes to the description of plan implementation (sec 6.2.4)
  1. This milestone refers to inspection plans; it does not refer to reactor units or stations. Therefore, the start of implementation is defined as the completion of at least one direct examination of piping included in the inspection plan for a site.
  2. The start of inspections applies to all in-scope lines and not just those that contain licensed material.

# Changes Due to Interpretations

- Section 6.2.4 notes continued
  3. Implementation of the inspection plan should include at least one direct examination of piping included in the inspection plan. It is not sufficient that the inspection has been planned; it also must be completed. Previous inspections that meet the intent of a direct examination as defined in the industry's inspection planning document qualify as starting even if they were performed prior to the approval of the Initiative or the formal development of the inspection plan.
  4. In accordance with Appendix C, the condition assessment does not require an actual examination of the component for other than high risk lines, but it should involve an engineering evaluation and associated documentation of the condition of the lines.

## Appendix C: Inspection Planning

- Revision 2 of the “Reasonable Assurance Document” incorporated as Appendix C
  - Rev 2 added underground piping with no significant change to philosophy or process
- Revision 2 significant changes
  - Additional considerations for grouping of underground piping
  - Additions to the susceptibility analysis and risk ranking section to better align with the latest GALL revision
  - A special section for tanks was not added based on the limited scope and current programs or regulations that already apply



## Summary

- Revision 2 did not include any significant changes that were not already expected under the Initiative
- Implementation expected by the end of the first quarter 2013