

Underground Piping and Tanks Integrity Initiative Recent Interpretations

Glen Schinzel

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Overview

- NEI 09-14 includes a process for interpreting the Initiative and related guidance
 - BPITF responsibility
 - Results communicated to the industry
- Requests were not addressed if the question asked whether utility actions meet the initiative
 - BPITF interprets guidance, not adequacy of utility implementation

Interpretations Since April 2012

- Milestone applicability to unit or site
 - Applicable to the program (which may have been defined for either unit or site)
- APEC survey (revised from earlier interpretation)
 - Indirect inspection tool to focus areas for direct examination
 - Provides useful information on general areas of interest

Interpretations Since April 2012

- Grouping of pipes and tanks together
 - No specific requirement
 - Utility must justify its groupings
- Negative pressure testing for tanks
 - Initiative does not specify how testing should be done
 - Utility must be able to justify approach considering delta pressure achieved and resulting loads