



James H. Riley  
PRINCIPAL ENGINEER  
NUCLEAR GENERATION DIVISION

**APC 12-44**

November 21, 2012

**To:** Administrative Points of Contact

**Subject:** Issue of Revision 2 to NEI 09-14, *Guideline for the Management of Buried Piping Integrity*

**Please distribute this letter to managers in your Design and Systems engineering departments, as well as personnel responsible for buried piping programs.**

The NSIAC approved the Buried Piping Integrity Initiative in November, 2009. Industry operating experience since that time resulted in a revision to the initiative, called the Underground Piping and Tanks Integrity Initiative, which was approved in September 2010. This letter distributes revision 2 to the guideline that supports these Initiatives. Revision 2 should be implemented by the end of the first quarter of 2013.

NEI 09-14, Revision 2 includes the following changes.

- The EPRI guideline for inspection of buried and underground piping and tanks is incorporated as Appendix C. The EPRI document was originally issued in April 2010 for use in buried piping inspections. It was recently revised to address the entire scope of the Underground Piping and Tanks Integrity Initiative. The EPRI guideline will no longer exist as a separate document.
- All approved interpretations of the Underground Piping and Tanks Integrity Initiative have been reflected in revision 2 where their information is appropriate to its content. This includes interpretations that address:
  - the definition of licensed material
  - components that are within the scope of the Initiative
  - implementation of inspection plans
  - start of inspections
  - the meaning of condition assessment

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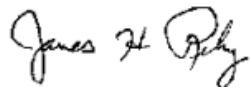
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- Recognition of INPO's ICES database as the means of capturing adverse inspection findings and leakage.

We appreciate your support of the Underground Piping and Tanks Integrity Initiative. We expect that our proactive response to this issue will have positive effects on both public confidence and future NRC activities in this area.

If you have any questions, please contact me at (202) 739-8137; [jhr@nei.org](mailto:jhr@nei.org).

Sincerely,

A handwritten signature in black ink that reads "James H. Riley". The signature is written in a cursive style with a large initial "J".

James H. Riley

Attachment

c: Buried Piping Integrity Working Group  
Buried Piping Integrity Task Force  
Buried Piping Points of Contact