

Buried Piping

Robert Tregoning
Robert Hardies
U.S. Nuclear Regulatory Commission

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Issue

- Groundwater incidents in the 2005 timeframe led to improved groundwater monitoring by the industry
- Several leaks from buried piping in 2009 resulted in groundwater contamination

NRC Response

- September 3, 2009, Chairman Jaczko tasked the staff with providing a summary of activities related to buried pipe
- December 3, 2009 the staff issued SECY 09-0174 in response to the Chairman's tasking memo
- Current and Ongoing NRC Activities

Scope of SECY-09-0174

- SECY 09-0174 examined
 - Current regulations
 - ASME Code requirements
 - NRC inspection activities
 - Industry activities
- Considered safety-related and nonsafety-related piping
- Concluded these areas to be acceptable for
 - Operating plants
 - Plants undergoing license renewal
 - New plants

SECY-09-0174: Regulations

- All reactors
 - 10 CFR Part 50 Appendix A, “General Design Criteria”
 - 10 CFR 50.55a, “Codes and Standards,”
 - 10 CFR 20.1301, “Dose Limits...”
 - 10 CFR 50, Appendix I, “Numerical Guides and Design Objectives...”
- License renewal
 - 10 CFR part 54.21(a), “Aging Management”
- New reactors
 - 10 CFR 20.1406, “Minimization of Contamination”
- **Current regulations are adequate to ensure safety function and to maintain releases below limits**

SECY-09-0174: Codes and Standards

- ASME Code
 - Scope is safety-related piping and structural integrity, not leak tightness
 - Section III
 - Section XI
- **Current ASME Code requirements are adequate to ensure structural integrity is maintained for buried, safety-related piping**
- NACE International

SECY-09-0174: NRC Inspection

- Reactor Oversight Plan (ROP)
 - No specific guidance that directs NRC inspectors to review buried piping activities
 - Smart samples when buried piping is available to inspect.
 - NRC inspects performance related to industry initiatives
- **Priority and scope of NRC inspection of buried piping activities is adequate based on safety significance of observed leaks**

SECY-09-0174: Industry Activities

- NEI 07-07, Groundwater Protection Initiative
 - Focused on detecting leaks
- INPO
 - Reviews since 2007
- EPRI
 - Workshops and training
 - “Recommendations for Effective Program to Control the Degradation of Buried Pipe,” December 2008
- Industry Buried Piping Integrity Initiative

Current NRC Activities

- Review industry Buried Piping Initiative
 - Public Meeting February 24
- Update GALL Report
- Monitor and respond to current buried piping leaks and groundwater contamination
- Issue Information Notice

Ongoing NRC Activities

- Participate in ASME Code
- Participate in NACE standards activities
- Reactor Oversight Plan
 - Smart inspection samples
 - Temporary inspection of implementation of the initiative
 - Potential audits
- Continue operating experience reviews

Conclusions

- NRC's objectives related to buried piping
 - Maintenance of intended function
 - Releases remain below regulatory limits
- Current regulations and industry activities are adequate with regard to these objectives
- NRC is monitoring and responding to events related to buried piping
- NRC is working to understand and assess licensee implementation of its Buried Piping Initiative