

Comments on AMP M41 for buried piping – dated August 20, 2010

I am a metallurgical engineer with over 25 yrs of corrosion control experience gained in the Oil & Gas industries with companies such as Marathon Oil, ARCO and Kinder Morgan Energy Partners. In addition, I am also the NACE STG 35 chairman that oversees all standards related to pipeline, tanks and well casings – which includes the inspection and cathodic protection standards, encompassing roughly 1/3 of all NACE standards. Lastly, I have actively contributed and designed the new EPRI database for the BPWorks 2.0 model being released to the industry later this year.

I have a few comments to offer for your consideration:

1. Page 1, Section 1. Scope - Does the scope include non-essential systems like culverts, storm drains, sewer, potable water? NEI 09-14 does. We have handled the buried pipe data for more than a dozen nuclear sites. A two unit site can typically have 35-45 miles of total buried pipe, These non-essential systems can account for up to half the total buried pipe mileage (15-20 miles). Based on the inspection requirements presented in Section 4, is it the intent of the NRC to require the excavation and inspection of 2-10% (10,000 ft or more) of these systems?
2. Page 12, Section 2(e). Direct Inspection Underground Tanks - UG Tanks can include double wall designs. How can the OD be inspected on the inner tank? Could leak monitoring in the annular space be an approved approach?
3. Page 12, Section 4(b)(x)(B)(2)(C, D, E) – What is meant by “backfill in accordance with SP0169”? This standard does not provide criteria for backfill.
4. Page 13, Section 5. Monitoring and Trending - NACE SP0285 does not have the word “trend” in the document yet this section says to follow the approach in this standard. This standard covers CP design, operation and maintenance activities. Similarly, SP0169 does not address trending.
5. Page 14, Section 10. Operating Experience - It would be helpful if you also included in each case whether or not the site had an operational CP system.

Thank you for considering these comments and I look forward to hearing your comments on Aug 24<sup>th</sup>.

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