

September 16, 2010

MEMORANDUM TO: Jerry Dozier, Chief
Aging Management of Reactor Systems
and Guidance Update
Division of License Renewal
Office of Nuclear Reactor Regulation

FROM: Robert Gramm, Sr. Mechanical Engineer **/RA/**
Aging Management of Reactor Systems
and Guidance Update
Division of License Renewal
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE AUGUST 24, 2010, LICENSE RENEWAL
PUBLIC TELECONFERENCE TO DISCUSS INDUSTRY
COMMENTS ON DRAFT CHANGES TO THE AGING
MANAGEMENT PROGRAM FOR BURIED AND UNDERGROUND
PIPING AND TANKS

The U.S. Nuclear Regulatory Commission staff (NRC or the staff) held a public teleconference on August 24, 2010, to discuss comments submitted by several external stakeholders, regarding the aging management program (AMP) XI.M41 for buried and underground piping and tanks dated August 11, 2010. Enclosures to this letter include a list of the meeting participants and the staff handouts that include the teleconference agenda. The staff provided an updated working level draft of AMP XI.M41 for discussion prior to the teleconference. The staff updated working level draft (version dated August 11, 2010) of AMP XI.M41 and the teleconference staff handouts are available in the NRC's Agencywide Documents Access and Management System under Accession No. ML102240061 and ML102360027 respectively. Stakeholder comments from the Nuclear Energy Institute (NEI) are located under Accession No. ML102320585; from Structural Integrity Associates under Accession No. ML102350027; from Pilgrim Watch under Accession No. ML102371274; and from Paul Blanch under Accession No. ML102371265.

A summary of the meeting's major discussions follows:

The staff stated the purpose of the teleconference was to continue discussions from an earlier teleconference on June 21, 2010 about the buried piping AMP. In particular, to discuss an updated working level draft of AMP XI.M41 that was prepared by the staff on August 11, 2010 following receipt of external stakeholder comments on an earlier version. The updated working level draft has not received any management or legal review. All stakeholder comments on the XI.M41 program will be considered.

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The staff discussed an overview of the current version of AMP XI.M41. This included a characterization of the guiding philosophy behind the AMP that the staff has generated.

Industry stakeholders (NEI, Entergy, Exelon, Electric Power Research Institute, Westinghouse, etc.) believed the revised AMP was a marked improvement over the initially proposed program that had been issued for public comment and discussed during a public workshop in May 2010, but also added that they believed the revised AMP was overly conservative in a number of areas including the extent of inspections required on buried tanks and the extent of expansion of inspections needed if problems with buried piping and tanks are identified.

The staff discussed tentative responses to a number of questions and comments that had been raised by NEI. The industry questioned the number of tank inspections that the AMP would direct an applicant to perform and that it would be excessive for very large tanks. The staff indicated they would re-examine those aspects in the AMP. The industry also questioned the need to double inspection samples and indicated their corrective action programs would determine appropriate measures to take when degradation is detected.

One commenter questioned the non-essential piping considered in scope of the AMP and the staff indicated the piping would be out of license renewal scope. The commenter pointed out the existence of double-walled tanks and the staff replied they agreed that some focused discussion on that type of tank was warranted in the AMP.

Several members of the public (P. Blanch, M. Lambert) provided comments in summary form. One commenter stated that the draft AMP: needs additional work to include baseline inspections of buried/underground piping and tanks to be completed prior to the agency approving a renewed license; contains an insufficient number of inspections; contains a lack of specific direction regarding inspection locations; inappropriately credits opportunistic inspections; and provides a lack of direction regarding installation of additional ground water monitoring wells and performance of hydrological studies.

A second stakeholder stated that they were pleased that the revised AMP: applies to partially buried tanks (a point of confusion in previous versions of the AMP); does a good job of addressing a wider variety of piping and tank materials (verses just being focused on steel); and includes required inspections of in-scope piping and tanks containing potentially hazardous materials (e.g., lube oil, diesel fuel oil, potentially radioactive water, etc.). However, this stakeholder was also concerned that it was not clear how the agency planned to apply this (or any) revised Generic Aging Lessons Learned Report AMP to licensees with previously renewed operating licenses or those whose applications are currently under review.

J. Dozier

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Due to the extent of comments, shortness of time, and at the request of stakeholders, the decision was made to hold a subsequent public meeting (within the next week) to allow for continued discussion of stakeholder comments.

Enclosures:
As stated

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**License Renewal Public Teleconference
To Discuss Industry Comments On Draft Changes
To The Aging Management Program
For Buried And Underground Piping And Tanks**

August 24, 2010

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