

September 29, 2010

MEMORANDUM TO: David L. Pelton, Chief
Aging Management of Plant Systems Branch
Division of License Renewal
Office of Nuclear Reactor Regulation

FROM: Matthew J. Homiack, General Engineer */RA/*
Program Operations Branch
Division of License Renewal
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE SEPTEMBER 1, 2010, LICENSE RENEWAL
TELECONFERENCE ON THE UPDATED LICENSE RENEWAL
AGING MANAGEMENT PROGRAM FOR BURIED AND
UNDERGROUND PIPING AND TANKS (XI.M41)

The U.S. Nuclear Regulatory Commission (NRC) staff held a public teleconference on September 1, 2010, to discuss written comments submitted by public and industry stakeholders on the NRC staff's August 11, 2010, draft of the Generic Aging Lessons Learned (GALL) Report aging management program (AMP) XI.M41, "Buried and Underground Piping and Tanks." This draft of GALL AMP XI.M41 is available in the NRC's Agencywide Documents Access and Management System (ADAMS) under Accession No. ML102240061. The NRC staff discussed the draft at a public teleconference on August 24, 2010.

The staff held this September 1, 2010, teleconference to allow for continued discussion of the stakeholder comments following the teleconference on August 24, 2010. For the follow-on teleconference, supplemental comments were submitted by the Nuclear Energy Institute (NEI), an industry group, Pilgrim Watch, a public stakeholder group, and Paul Blanch, a member of the public. These supplemental comments, dated August 30, 2010, are available in ADAMS under Accession Nos. ML102420732, ML102420742, and ML102420724, respectively. The NRC staff provided documents with a listing of comments from Pilgrim Watch and Paul Blanch. These documents are available under Accession Nos. ML102430223 and ML102430235, respectively, and were provided for this teleconference.

An enclosure to this memorandum lists the meeting participants. A summary of the meeting's discussions follows:

1. Comments from Paul Blanch

Mr. Blanch stressed that NRC should apply aspects of this draft AMP to license renewal applications currently under review, rather than wait until the final GALL Report

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revision is issued. In response, the NRC staff stated that this comment is outside the scope of this meeting, as per the opening remarks. The NRC staff further stated that its reviews of current applications address, through the request for additional information process, issues concerning aging management of buried and underground piping and tanks.

Mr. Blanch also commented that (a) the NRC should not rely on certain assumptions concerning backfill and cathodic protection, (b) the benefits should be considered in excavating piping, and (c) the scope of the program should include tanks in contact with concrete (e.g., the spent fuel pool and the condensate storage tank). The NRC staff stated that aging management recommendations for the spent fuel pool and the condensate storage tank are included in other sections of the GALL Report.

2. Comments from Pilgrim Watch

The Pilgrim Watch representative, Mary Lampert, provided an overview of the comments submitted by Pilgrim Watch and highlighted those issues believed to be most important. In particular, Ms. Lampert commented that (a) before the period of extended operation there should be baseline inspections to establish corrosion rates, (b) there should be a requirement to install monitoring wells, and (c) the AMP should include a broad statement so that it would cover all potential buried and underground piping and tank materials. In response to the comment on materials, the NRC staff stated that the scope of the AMP covers the common materials and other materials would be addressed on a case-by-case basis during the review of individual license renewal applications.

3. Comments from NEI

Representatives from NEI discussed the supplemental comments provided by NEI. In particular, the NEI representatives commented that the AMP does not address flowable fill and that the percentages of inspections for piping containing hazardous material are significantly higher than the inspections for safety-related piping, although no basis is provided for this difference. The NRC staff stated that it expects piping runs containing hazardous material to be short.

The NEI representatives also commented that high-density polyethylene (HDPE) piping is more susceptible to damage from scratches, which could result from digging-up piping for inspections. The NEI representatives suggested that instead of digging-up actual inservice HDPE piping, a test station could be used for inspections. The Pilgrim Watch representative opposed this approach, explaining that the test station may not be representative of the site ground conditions. The NRC staff stated that it would further evaluate this approach.

4. Comments from Others

Two other members of the public also provided comments. Mr. Ray Shadis, of the New England Coalition, supported the comments from Paul Blanch and Pilgrim Watch, and stated that the NRC should issue interim guidance or ask for licensees to amend their

existing license renewal applications. Mr. Ulrich Witte, of Northern Lights Engineering, commented that transparency with the NRC is important, citing personal experience with buried piping issues at a nuclear power plant.

The NRC staff informed all stakeholders that their comments would be considered and documented in an NRC NUREG Report.

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September 1, 2010

License Renewal Teleconference on the
Updated License Renewal Aging Management Program for Buried
and Underground Piping and Tanks (XI.M41)

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William Holston	NRC
Tim Lupold	NRC
Allen Hiser	NRC
Jerry Dozier	NRC
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John Thomas	FENOC
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Ulrich Witte	Northern Lights Engineering
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Ray Shadis	New England Coalition

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