

August 18, 2011

Mr. Alex Marion,
Vice President Nuclear Operations
1776 Street, NW, Suite 400
Washington, DC 20006-3708

Dear Mr. Marion,

On December 2, 2009, the Nuclear Regulatory Commission (NRC) staff issued SECY 09-0174, "Staff Progress in Evaluation of Buried Piping at Nuclear Reactor Facilities" (Agencywide Document Access Management System (ADAMS) Accession number ML093160004). This evaluation discussed a number of ongoing staff activities to address the issue of buried piping degradation, including the industry's initiatives. On May 18, 2010, the staff issued a Buried Piping Action Plan (ADAMS Accession Number ML101590171) that identifies and tracks these ongoing activities. In particular, the plan includes several activities intended to enable the staff to develop an understanding of the industry's "Buried Piping Integrity Initiative" and "Underground Piping and Tanks Integrity Initiative." The action plan also includes activities that involve collection of information that the staff may use to evaluate ongoing buried piping degradation.

In an effort to better understand the scope of buried piping subject to degradation and leakage, the staff requested, via letter to Mr. Anthony R. Pietrangelo, dated August 18, 2010, that the Nuclear Energy Institute (NEI) provide information related to the design and leakage history of underground piping at nuclear power plants. The NEI Buried Piping Integrity Task Force worked with NRC staff to clearly define the information requested and to develop a spreadsheet to capture the desired data. By letter to Michele Evans, dated May 17, 2011, you provided the requested information. Additionally, on September 27, 2010, by letter to William Borchardt, NEI forwarded the Underground Piping and Tanks Integrity Initiative. This proposed initiative revised the previously issued Buried Piping Integrity Initiative and extended its scope to underground components. By letter to Eric Leeds, dated November 3, 2010, NEI provided NEI 09-14, Guideline for the Management of Buried Piping Integrity. This guideline explained details about the intent of the Buried Piping Integrity Initiative. Finally, on March 7, 2011, by letter to Eric Leeds, you provided NEI 09-14, Revision 1, which was updated to reflect the additional scope included in the Underground Piping and Tanks Integrity Initiative. This letter also provided the Nuclear Strategic Issue Advisory Committee reports that summarize industry progress related to the piping and tanks initiatives. The information you have provided via this series of letters has helped the staff understand the industry's plans and progress related to buried and underground piping. All of these communications are publically available in ADAMS.

Over the past two years, the staff has periodically met with members of the NEI Buried Piping Integrity Task Force, the Institute of Nuclear Power Operations, and the Electric Power Research Institute's Buried Piping Integrity Group to discuss the initiatives, industry arrangements for collection, documentation and sharing of operational experience information and industry's existing and planned research programs to support inspection of buried piping. We expect to continue to meet on a routine basis with the next meeting tentatively scheduled for early fall, 2011.

In accordance with our buried piping action plan, we are currently developing a temporary instruction to assess licensee performance with respect to the industry initiatives. We intend to solicit your comments before implementing the temporary instruction.

We would like to convey our appreciation to NEI and the industry for addressing the issue of buried and underground piping integrity. We appreciate the industry's development of the initiatives, continuing communication with NRC and, in particular, the collection of operating experience and program scope information you provided in the letter dated May 17, 2011. We encourage you to continue to apply appropriate focus on inspection and preventive maintenance of buried and underground piping or tanks that are safety-related or that contain radioactive materials.

We look forward to receiving regular updates on your progress in this area. If you have any questions, please contact Robert O. Hardies of my staff at 301-415-5802.

Sincerely,

/RA/

Michele G. Evans, Director
Division of Component Integrity
Office of Nuclear Reactor Regulation

cc: J. Riley, Nuclear Energy Institute
M. Korsnick, Chief Nuclear Officer, Constellation Energy

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