

## APPENDIX B

### AGING MANAGEMENT PROGRAMS AND ACTIVITIES

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## **B.1.5 BURIED PIPING AND TANKS INSPECTION**

### **Program Description**

The Buried Piping and Tanks Inspection Program is a new program that manages loss of material for the external surfaces of buried and underground piping and tanks composed of any material through preventive, mitigative, and inspection activities.

This program will be implemented prior to the period of extended operation.

### **NUREG-1801 Consistency**

The Buried Piping and Tanks Inspection Program will be consistent with the program described in NUREG-1801, Section XI.M41, Buried and Underground Piping and Tanks.

### **Exceptions to NUREG-1801**

None

### **Enhancements**

None

### **Operating Experience**

The Buried Piping and Tanks Inspection Program is a new program. Industry operating experience will be considered when implementing this program. Plant operating experience for this program will be gained as it is implemented during the period of extended operations and will be factored into the program via the confirmation and corrective action elements of the GGNS 10 CFR 50 Appendix B quality assurance program.

Prior to installation of a new cathodic protection system at GGNS in December of 2009, a native area potential earth current inspection was performed throughout the protected area to establish baseline readings. No degraded conditions were identified, although two areas were noted to have a higher potential for coating degradation.

The GGNS program will be based on the program description in NUREG-1801, which in turn is based on industry operating experience that demonstrates that this program is effective for managing the aging effects described herein. As such, operating experience assures that implementation of the Buried Piping and Tanks Inspection Program will manage the effects of aging such that applicable components will continue to perform their intended functions consistent with the current licensing basis for the period of extended operation.

The process for review of future plant-specific and industry operating experience for this program is discussed in [Section B.0.4](#).

## **Conclusion**

The Buried Piping and Tanks Inspection Program will be effective for managing aging effects since it will incorporate proven monitoring techniques, acceptance criteria, corrective actions, and administrative controls. The Buried Piping and Tanks Inspection Program provides assurance that effects of aging will be managed such that applicable components will continue to perform their intended functions consistent with the current licensing basis through the period of extended operation.