

In the Matter of: Entergy Nuclear Operations, Inc.  
(Indian Point Nuclear Generating Units 2 and 3)



ASLBP #: 07-858-03-LR-BD01  
Docket #: 05000247 | 05000286  
Exhibit #: NYS000196-00-BD01  
Admitted: 10/15/2012  
Rejected:  
Other:

Identified: 10/15/2012  
Withdrawn:  
Stricken:

NYS000196

Submitted: December 16, 2011

**Conte, Richard**

**From:** Roberts, Darrell *RD*  
**Sent:** Friday, April 23, 2010 5:15 PM  
**To:** Conte, Richard; Gray, Harold; Wilson, Peter  
**Subject:** RE: Buried piping - Proposed NRC Action

Please connect these thoughts and any others with the appropriate NRR/DCI staff - as Fred Brown is working with them in formulating a generic communication approach in the very near term.

Fred was focused on the "high-pressure discharge-buried piping" being a unique nuance that we had not been focused on before (i.e., most buried piping of safety-related systems has been associated with low-pressure suction sides of pumps). He and DCI may need to be enlightened as to any other aspects (such as those you list below) that may need to be addressed in the generic communication.

thx,  
DJR

**From:** Conte, Richard *RC*  
**Sent:** Friday, April 23, 2010 1:05 PM  
**To:** Gray, Harold; Roberts, Darrell; Wilson, Peter  
**Subject:** RE: Buried piping - Proposed NRC Action

interesting that while you and Fred Brown were discussing the need for generic communications, Harold implemented writing his ideas down this morning.

After IndianPoint, Oyster Creek, VY and now Salem, it is clear that the industry might not have a good understand for safety related applications:

what by design is buried;

what is buried and not covered by ASME code e.g., 1 inch piping.

because it is buried, how do they assess external conditions.

if inaccessible what maintenance and testing is done periodically, through internal means

if underground but not buried what kind of surveillance or PM is done in the vaults and pipe chases.

do they have a buried pipe program if they have not submitted a license renewal application.

**From:** Gray, Harold *HG*  
**Sent:** Friday, April 23, 2010 9:52 AM  
**To:** Conte, Richard  
**Subject:** Buried piping - Proposed NRC Action

The buried pipe degradation conditions at O Creek, Indian Point and Salem, while not having serious operability or safety consequences, collectively illustrate that Plants do not fully know what they have in the scope and condition of buried piping.

The proposal is for NRC to issue generic direction to the industry on buried piping as a Generic Letter, Bulletin or Information Notice with at least the following scope:

Confirm that there is no buried Class 1 piping at the plant site.

Confirm that buried Service water pipe and components are currently within the scope and control as previously determined by evaluations and responses to GL 89-13 and its followups.

Determine the scope of other Class 2 and Class 3 safety or risk significant buried pipe.

For all buried pipe systems, other than service water components, confirm that the provisions of the ASME Code Section XI, IWA-5244 for buried pipe and components have been met. Additionally, confirm by sampling including excavation and testing that the coating of buried piping has been properly applied and is currently protecting the pipe from corrosion.

Harold Gray, 610-337-5325

## Conte, Richard

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Harold Gray, 610-337-5325

**Conte, Richard**

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**From:** Gray, Harold  
**Sent:** Friday, April 23, 2010 11:27 AM  
**To:** Hoffman, Keith; Hardies, Robert  
**Cc:** Conte, Richard; Lupold, Timothy  
**Subject:** FW: Buried piping - Proposed NRC Action

FYI, a plan.

You may already have something like this in the works, but as time moves on it seems more needed.

VY can be added to the list.

Harold Gray, 610-337-5325

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