## February 25, 2013

MEMORANDUM TO: Timothy R. Lupold, Chief

Piping and NDE Branch Division of Engineering

Office of Nuclear Reactor Regulation

FROM: Robert O. Hardies. Senior Level Advisor /RA/

Division of Engineering

Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF CATEGORY 2 PUBLIC MEETING BETWEEN THE

U.S. NUCLEAR REGULATORY COMMISSION AND INDUSTRY REPRESENTATIVES TO DISCUSS THE PROGRESS ON THE INDUSTRY'S BURIED PIPING AND UNDERGROUND PIPING AND

TANKS INTEGRITY INITIATIVES

On December 5, 2012, the Nuclear Regulatory Commission (NRC) staff held a Category 2 public meeting with representatives from the Nuclear Energy Institute (NEI), the Electric Power Research Institute, the Institute for Nuclear Power Operations, the American Society of Mechanical Engineers, NACE International (formerly known as the National Association of Corrosion Engineers) and other industry representatives at NRC Headquarters in Rockville, MD. This public meeting was one in an ongoing series of interactions between NRC staff, industry representatives and other stakeholders to understand the scope and schedule for industry activities related to degradation of buried piping. Minutes of previous meetings are available at Agencywide Document Access and Management System (ADAMS) Accession Numbers ML093070162, ML100810295, ML103230366, ML11137A171, ML113210661, and ML12116A043. A list of meeting attendees is enclosed. The meeting notice and agenda is available at ADAMS Accession Number ML12320A243.

At the beginning of the meeting, NRC staff reviewed the status of the NRC's Buried Piping Action Plan, which is available at ADAMS Accession number ML11332A122. The staff described the action plan activities, schedule for action, and reiterated NRC objectives with respect to buried piping. The staff described the temporary instruction (TI-182) for NRC to perform inspections of licensee activities related to the Buried Piping and Underground Piping and Tanks Integrity Initiatives. The staff also discussed the basis for a pre-initiative era rate typical rate of occurrence of leaks from buried piping and reviewed the staff's understanding of risk ranking processes.

The industry provided updates on the implementation status of the current Buried Piping and Underground Piping and Tanks Integrity initiatives and discussed operating experience. The Electric Power Research Institute discussed progress and plans related to development and deployment of nondestructive examination equipment, processes and procedures.

Industry described the Buried Piping Integrity Task Force effort to collect and evaluate inquiries related to the Buried Piping and Underground Piping and Tanks Integrity initiatives. The task force publishes its interpretations on the Nuclear Energy Institute website. Following the industry presentation, INPO reviewed operating experience related to degradation of buried and underground piping.

The staff discussed changes to the Generic Aging Lessons Learned (GALL) report, Revision 2, Aging Management Program XI.M41, "Buried and Underground Piping and Tanks." Interim staff guidance has been issued for public comment.

The American Society of Mechanical Engineers (ASME) discussed the status of Section XI buried piping activities, including plans and progress in the "Task Group Buried Component Inspection and Testing." This task group is developing potential changes to the ASME Boiler and Pressure Vessel Code to address inspection, testing, mitigation, repair, replacement and design of buried and underground piping.

NACE International described ongoing activities in NACE Task Group 404, "Nuclear Buried Piping," to develop buried piping inspection, assessment and corrosion prevention standards optimized for nuclear power plant applications. The Task Group has issued a draft summary report. Once the report is issued, the Task Group will be retired and a new Task Group will be established to develop standards for cathodic protection, coatings, materials selection, NDE and training related to buried piping at nuclear plants.

All presentations made at the meeting are available in ADAMS Accession number ML12345A373 (part of the package).

During the previous meeting the following action items were recorded, with the current status noted:

- 1) The staff will provide examples of events in EPIX (and ICES) that could be categorized in more than one manner and will discuss recommendations for prioritizing categories. (ongoing)
- 2) The staff will discuss with NEI the possible uses of the "cause code" information being gathered in the EPIX database. (ongoing)

During this meeting the following new action items were recorded:

- 1) Industry will discuss and address whether the initiative continues to be applicable to a plant that decides to cease permanent operations.
- 2) EPRI will determine whether EPRI report 1025220 can be made publically available.
- 3) The NRC will revise TI-182 to reference revision 2 of NEI-09-14.
- 4) NRC and EPRI staff will initiate communications on guided wave inspections.
- 5) NRC and EPRI staff will exchange information on saturated eddy current examination.

The next meeting was tentatively scheduled for April, 2013.

Enclosure: List of attendees

CONTACT: Robert O. Hardies, NRR/DE (301) 415-5802

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