

October 30, 2013

MEMORANDUM TO: Patrick L. Hiland, Director
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 INITIATIVE

On October 9, 2013, the U.S. 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 (INPO), 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 and underground piping and tanks. Minutes of previous meetings are available at Agencywide Document Access and Management System (ADAMS) Accession Numbers ML093070162, ML100810295, ML103230366, ML11137A171, ML113210661, ML12116A043, ML13050A590 and ML13133A206. A list of meeting attendees is enclosed. The meeting notice and agenda is available at ADAMS Accession Number ML13241A502.

At the beginning of the meeting, NRC staff reviewed the status of the NRC's Buried Piping Action Plan (ADAMS Accession Number ML13107A984). 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. Phase I inspections are complete. Phase II inspections are approximately one-third complete. Results from the Phase II inspections that have been completed seem to indicate uniform implementation of the initiatives.

Enclosure:
Attendance list

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NEI provided an update of Underground Piping and Tanks Initiative activities including initiative changes, treatment of outliers and overall implementation status. The NEI presentation indicated that all plants have met the Initiative milestones to date and are on track to meet future milestones. There was a discussion about the role of the initiative at plants that permanently shut down. The industry indicated that those plants would continue to be subject to the initiative until the decommissioning plan is implemented. Industry is still defining the timing of the transition. INPO described its assessment role and summarized industry performance and findings with respect to the initiatives. INPO also discussed approaches for future enhancements to the graphical summaries of industry experience.

The Electric Power Research Institute discussed progress and plans related to development and deployment of nondestructive examination equipment, processes and procedures. Highlights included descriptions of buried pipe inspection technology, tank inspection technology, guided wave for direct inspections, future research plans and currently available publications. EPRI also reviewed the Buried Piping Integrity Group activities, including reviewing participation, highlights of recent meetings and progress in populating the buried piping inspection results database. Progress in EPRI's Cathodic Protection User Group was described.

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.

All presentations made at the meeting are available in ADAMS Accession number ML13291A415 (part of the package).

The following action items were recorded at previous meetings, with the current status noted:

- 1) Industry will discuss and address whether the initiative continues to be applicable to a plant that decides to cease permanent operations (completed).
- 2) The NRC will revise TI-182 to reference revision 2 of NEI-09-14 (completed).
- 3) NRC and EPRI to establish a date to discuss guided wave practices (completed).
- 4) NRC and EPRI staff will exchange information on saturated eddy current examination (ongoing).

During this meeting the following new action items were recorded:

- 1) NEI, INPO and NRC will discuss changing the graphical depiction of industry events such as leaks and significant degradation with the objective of more effectively demonstrating trends in the performance of piping and tanks that are safety related or contain radiologic or environmentally hazardous materials.

- 2) NRC and NEI to discuss examples of regulatory methods used in some previous applications for qualification or demonstration of NDE techniques.

The next meeting is scheduled for March 5, 2014, at NRC headquarters.

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- 2) NRC and NEI to discuss examples of regulatory methods used in some previous applications for qualification or demonstration of NDE techniques.

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