

**DOUGLAS J. WALTERS**  
*Vice President, Regulatory Affairs*

1201 F Street, NW, Suite 1100  
Washington, DC 20004  
P: 202.739.8093  
djw@nei.org  
nei.org



May 5, 2014

Mr. Eric J. Leeds  
Director, Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Underground Piping and Tanks Integrity Initiative

**Project Number: 689**

Dear Mr. Leeds:

The purpose of this letter is to convey the semi-annual report on implementation status, operating experience, and developments in NDE technology for the Underground Piping and Tanks initiative. The December 31, 2013 report, was provided to the NSIAC during its meeting in March, 2014. A copy of the NSIAC report is attached for your information.

The NEI Nuclear Strategic Issues Advisory Committee (NSIAC) approved the Underground Piping and Tanks Integrity Initiative in September, 2010 and is implemented through NEI 09-14, "Guideline for the Management of Underground Piping and Tank Integrity." One of the commitments in NEI 09-14 is the preparation of semi-annual report to the NSIAC.

You will note as of the time we completed the implementation survey, all plants were on schedule for implementation of the identified program milestones, with the exception of the several plants that are in transition to decommissioned status. The process to formally transfer licensee jurisdiction of the underground components from the Underground Piping and Tanks Initiative to the Decommissioning Transition Plan is in development and is expected to be resolved before the end of 2014.

We will continue to keep you and your staff informed of the status of industry activities associated with this important program. If you have any questions, please contact me at 202.739.8093; [djw@nei.org](mailto:djw@nei.org) or Mark Richter at 202.739.8106; [mar@nei.org](mailto:mar@nei.org).

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Sincerely,

A handwritten signature in black ink that reads "Douglas J. Walters". The signature is written in a cursive style with a horizontal line underlining the name.

Douglas J. Walters

Attachment

c: Mr. Daniel H. Dorman, NRR, NRC  
Mr. Robert O. Hardies, NRR/DE, NRC