



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 23, 2015

Mr. Jason Remer
Nuclear Energy Institute
1201 F. St, NW
Suite 1100
Washington, DC 20004-1218

SUBJECT: LICENSE RENEWAL INTERIM STAFF GUIDANCE, LR-ISG-2015-01,
"CHANGES TO BURIED AND UNDERGROUND PIPING AND TANK
RECOMMENDATIONS"

Dear Mr. Remer:

I am writing to inform the Nuclear Energy Institute of the opportunity to comment on the enclosed draft License Renewal Interim Staff Guidance (LR-ISG), LR-ISG-2015-01, "Changes to Buried and Underground Piping and Tanks Recommendations." Enclosed is a copy of the *Federal Register* notice that announces the U.S. Nuclear Regulatory Commission's (NRC's) request for comments and provides instructions on how to submit comments.

Based on recent operating experience and the staff's review of several license renewal applications, the NRC staff has determined that existing guidance in NUREG-1800, Revision 2, "Standard Review Plan for License Renewal Applications for Nuclear Power Plants," (SRP-LR) and NUREG-1801, Revision 2, "Generic Aging Lessons Learned (GALL) Report," should be revised to reflect new recommendations associated with buried and underground piping and tanks within the scope of Title 10 of the *Code of Federal Regulations* Part 54. Examples of the more significant changes include: (a) the number of recommended buried piping inspections; (b) cathodic protection acceptance criteria alternatives; and (c) the recommended sample size increase when certain acceptance criteria are not met. In addition, AMP XI.M41 was rewritten to eliminate duplication of recommendations and reduce the number of tables and footnotes to tables.

To inform other stakeholders of the opportunity to provide comments on the draft LR-ISG-2015-01, courtesy copies of this letter are being sent to subscribers of an NRC electronic mailing list on general license renewal topics.

J. Remer

-2-

If you have any questions, please contact William Holston of my staff by telephone at 301-415-8573 or by e-mail at William.Holston@nrc.gov, or Catherine Nolan of my staff by telephone at 301-415-1535 or by email at Catherine.Nolan@nrc.gov.

Sincerely,

/RA/

Jane E. Marshall, Deputy Director
Division of License Renewal
Office of Nuclear Reactor Regulation

Enclosures:
As stated

cc: Reactor License Renewal Stakeholder
Group Listserv

J. Remer

-2-

If you have any questions, please contact William Holston of my staff by telephone at 301-415-8573 or by e-mail at William.Holston@nrc.gov, or Catherine Nolan of my staff by telephone at 301-415-1535 or by email at Catherine.Nolan@nrc.gov.

Sincerely,

/RA/

Jane E. Marshall, Deputy Director
Division of License Renewal
Office of Nuclear Reactor Regulation

Enclosures:
As stated

cc: Reactor License Renewal Stakeholder
Group Listserv

DISTRIBUTION:
See next page

**ADAMS Accession Nos.: ML15125A325 (Package), ML15125A316 (Ltr), ML15125A377 (LR-
ISG), ML15125A388 (FRN)**
***concurrence via email**

OFFICE	ME:DLR:RARB	ME:DLR:RARB	LA:DLR:RPB1	BC:DLR:RSRG
NAME	WHolston*	CNolan*	YEdmonds*	SBloom*
DATE	06/22/15	06/22/15	06/16/15	05/20/15
OFFICE	BC:DLR:RARB	STA:NRR/DE	STA:NRR/DLR	OGC
NAME	DMorey*	RHardies*	AHiser*	STurk*
DATE	05/20/15	05/20/15	5/26/15	6/17/15
OFFICE	D:DLR			
NAME	JMarshall			
DATE	06/ 23 /15			

OFFICIAL RECORD COPY

Letter to J. Remer from J. Marshall dated June 23, 2015

SUBJECT: LICENSE RENEWAL INTERIM STAFF GUIDANCE, LR-ISG-2015-01,
"CHANGES TO BURIED AND UNDERGROUND PIPING AND TANKS RECOMMENDATIONS"

DISTRIBUTION:

E-MAIL:

PUBLIC

RidsNrrDir Resource

RidsNrrDirRpb1 Resource

RidsNrrDirRpb2 Resource

RidsNrrDirRarb Resource

RidsNrrDirRapb Resource

RidsNrrDirRasb Resource

RidsNrrDirRerb Resource

RidsNrrDra Resource

RidsNrrDe Resource

RidsNrrDss Resource

RidsOgcMailCenter Resource

RidsOpaMail Resource

RidsOcaMailCenter Resource

WHolston, NRR

MGray, RI

SVias, RII

AStone, RIII

GMiller, RIV