

May 13, 2015

MEMORANDUM TO: John W. Lubinski, 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: BURIED PIPING ACTION PLAN ACTION ITEM 4-5, "EVALUATE THE NEED TO ISSUE GENERIC COMMUNICATION SOLICITING LICENSEE COMMITMENTS TO THE BURIED PIPING INTEGRITY INITIATIVE," FINAL CLOSURE

Buried Piping Action Plan Action Item 4-5, "Evaluate the need to issue generic communication soliciting licensee commitments to the Buried Piping Integrity Initiative," is a semi-annual recurring assessment of industry's implementation of its Buried Piping Integrity Initiative and Underground Piping and Tanks Initiative. The Buried Piping Action Plan describes U.S. Nuclear Regulatory Commission (NRC) activities related to degradation of buried and underground piping and tanks. This memorandum completes the final periodic assessment under this Action Plan Action Item and documents final closure of the associated yellow ticket.

The Office of Nuclear Reactor Regulation Division of Engineering (DE) has been tasked, under the Action Plan, to periodically assess the need to issue generic communication soliciting licensee commitments to the Buried Piping Integrity Initiative. Assessments since 2010, available at Agencywide Document Access and Management System (ADAMS) Accession Numbers ML14310A792, ML14135A456, ML12320A325, ML11319A157, ML12130A094, ML13137A441, have not identified a need to solicit licensees to commit to the NRC to follow the initiatives. Over the past several years the staff has held eleven public meetings with industry to discuss buried and underground piping. Minutes of these meetings are available at ADAMS Accession Numbers ML093070162, ML100810295, ML103230366, ML11137A171, ML113210661, ML12116A043, ML13050A590, ML13301A792, ML13133A206, ML14184B374, and ML15023A490. At these meetings, the Nuclear Energy Institute (NEI) provided status reports that describe industry's performance with respect to implementing the initiative. According to the NEI reports, all nuclear power plants are currently in full compliance with achieving initiative milestones. Furthermore, NEI provided the staff a copy of its status report to the NEI Nuclear Strategic Issues Advisory Committee (the NSIAC Report) which includes a status report on industry implementation that indicates the industry is fully participating.

In December, 2011 the staff issued a temporary instruction, TI-2515/182, "Review of the Implementation of the Industry Initiative to Control Degradation of Underground Piping and Tanks," that provided for NRC inspection of implementation of the initiative at every plant. The results of the temporary instruction inspections revealed that licensees have implemented their initiative.

Based on the meetings with industry, the NEI status reports, and the results of the temporary inspection instruction, the staff currently has reasonable assurance that all licensees have implemented the initiatives. Accordingly, the staff currently has no reason to pursue alternative means of encouraging licensee participation in the initiatives.

Furthermore, in the Staff Requirements Memorandum for SECY 2011-0019, the Commission stated:

“The Commission has approved the SMRG recommendation not to incorporate the voluntary industry initiative on groundwater protection into the regulatory framework. The staff should, instead, monitor the effectiveness of the industry initiatives.”

The current DE conclusion is consistent with Commission direction.

This completes Buried Piping Action Plan Action Item 4-5. Recurring yellow ticket Y020100186 should be permanently closed, accordingly.

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