

# **Underground Piping and Tanks Integrity Initiative**

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# Background

- **Buried piping leaks are occurring**
- **Leakage of radiological fluid is a public confidence concern**
- **The industry has lowered its threshold for leak reporting to ensure we are maximizing our opportunities to learn from each other**
- **No significant safety or radiological concerns to date**

# Industry Actions

- **Buried Piping Integrity Initiative approved in November 2009**
- **Goal**
  - **Reasonable assurance of structural and leakage integrity of buried piping**
    - **Special emphasis on piping that contains radioactive materials**
- **Builds on the Ground Water Protection Initiative**
  - **Proactive assessment and management**
  - **Share operating experience**
  - **Drive inspection and analysis technology**

# Considerations for Initiative Revision

- **Buried Piping Integrity Initiative applies to all buried piping that is in direct contact with the soil**
- **Operating experience**
  - **Degradation of piping in vaults and tunnels can occur**
  - **Initiative does not address tanks**
- **Importance of maintaining public confidence**

# **Expansion of Initiative Scope**

- **Added underground piping and tanks outside of buildings whether or not they are in direct contact with the soil if they**
  - **Contain licensed radioactive material or**
  - **Are safety related**
- **Identified the new Initiative and the original Initiative as the “Underground Piping and Tanks Integrity Initiative”**

# **Initiative Framework**

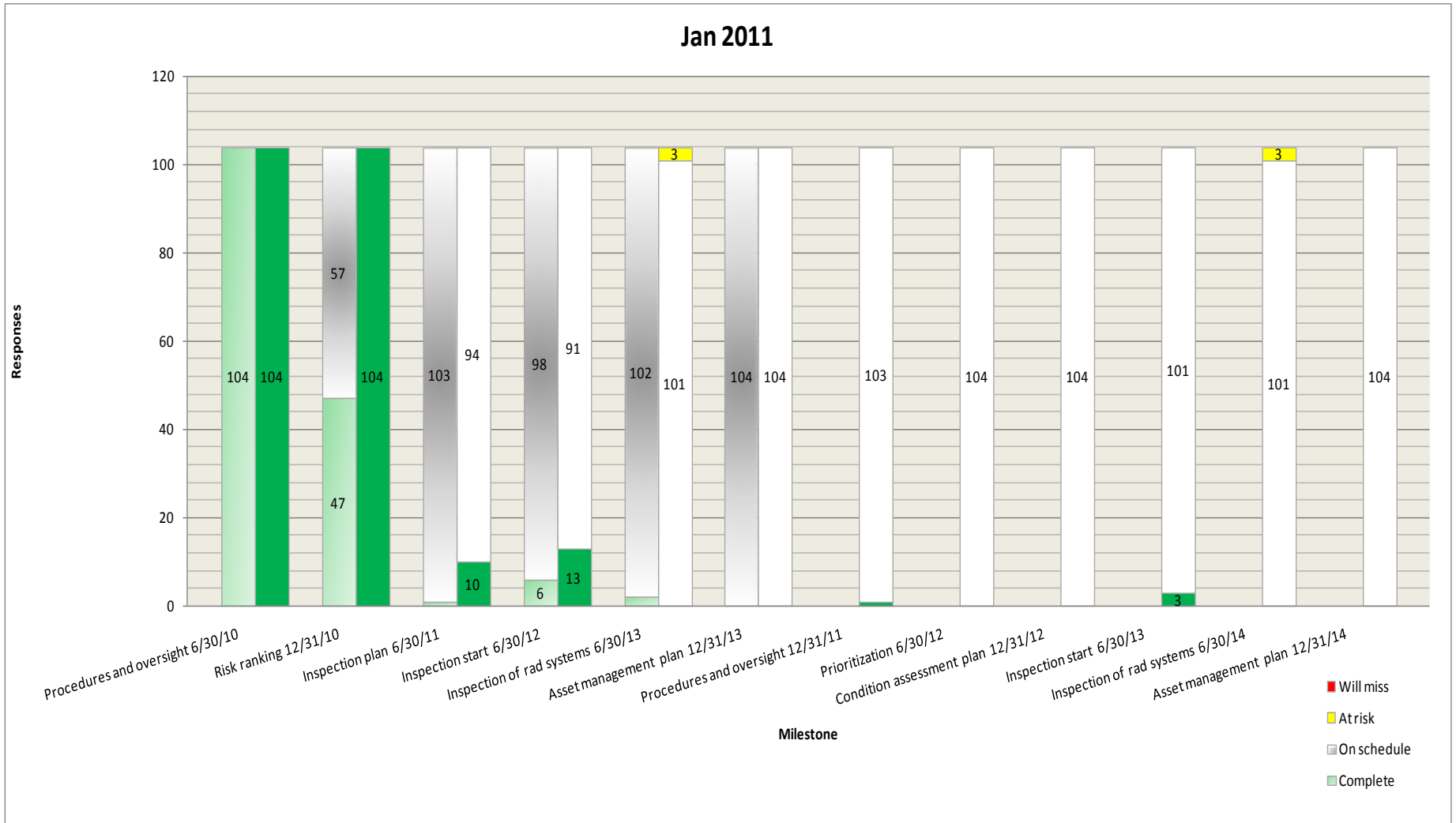
- **Milestones**

- 1. Procedures and oversight**
- 2. Risk ranking / Prioritization**
- 3. Condition assessment plan**
- 4. Plan implementation**
- 5. Condition assessment of components containing licensed material**
- 6. Asset management plan**

- **Purposeful approach**

- **Establish a foundation**
- **Allow time for inspection planning and technology development**
- **Develop strategic plans**

# Initiative Implementation Status



# Summary

- **Essential to ensure that resources are directed in a manner consistent with safety significance**
- **Existing regulatory framework is adequate**
- **Underground Piping and Tanks Integrity Initiative actions go beyond what is necessary for public health and safety**