

Industry Comments on Buried Piping TI

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General

- We understand that the intention of the TI is to assess utility implementation of the Underground Piping and Tanks Integrity Initiative and NEI 09-14
- Draft TI appears to be more of an assessment of incorporation of “good practices” into buried piping programs versus adherence to our Initiative
 - TI content will become an expectation

Initiative Implementation

- TI should be focused on clear measures of Initiative implementation
- Examples
 - Text of Initiatives
 - Initiative Milestones
 - “Shall” statements in NEI 09-14 rev 1

Implementation Methods

- TI should not address “how” the Initiative is being met
 - Methods vary between utilities
 - Guidance varies (EPRI versus NACE)
- Examples
 - Piping segmentation criteria
 - Operations approval of scope exclusions
 - References to the EPRI guidance document

Trending and Background

- Items that collect background and trending information should not be included in the TI
- Examples
 - Number of feet of buried piping in program
 - Photographic documentation of inspections
 - Additional duties of buried piping program owners
 - Details on cathodic protection system operation

Summary

- For clarity, limit the TI to information necessary to ascertain Initiative implementation
- Additional information requests
 - Can cause unnecessary licensee burden and
 - May establish unfounded expectations