

July 7, 2014

MEMORANDUM TO: Patrick L. Hiland, 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: SUMMARY OF JUNE 11, 2014 CATEGORY 2 PUBLIC MEETING
BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND
INDUSTRY REPRESENTATIVES TO DISCUSS THE PROGRESS ON
THE INDUSTRY'S BURIED PIPING AND UNDERGROUND PIPING
AND TANKS INITIATIVE

On June 11, 2014, the U.S. Nuclear Regulatory Commission (NRC) staff held a Category 2 public meeting with representatives from the Nuclear Energy Institute (NEI), the Electric Power Research Institute (EPRI), the Institute for Nuclear Power Operations (INPO), and other industry representatives at NRC Headquarters in Rockville, MD. This public meeting was one in an ongoing series of interactions between NRC staff, industry representatives and other stakeholders to understand the scope and schedule for industry activities related to degradation of buried and underground piping and tanks. Minutes of previous meetings are available at Agencywide Document Access and Management System (ADAMS) Accession Numbers ML093070162, ML100810295, ML103230366, ML11137A171, ML113210661, ML12116A043, ML13050A590, ML13133A206, and ML13301A792. A list of meeting attendees is enclosed. The meeting notice and agenda is available at ADAMS Accession Number ML14147A341. Meeting presentations are available at ADAMS Accession Number ML14184B374.

At the beginning of the meeting, NRC staff reviewed the status of the NRC's Buried Piping Action Plan. The staff described the action plan activities, schedule for action, and reiterated NRC objectives with respect to buried piping. The staff described the temporary instruction (TI-182) for NRC to perform inspections of licensee activities related to the Buried Piping and Underground Piping and Tanks Integrity Initiatives. Phase I inspections are complete. Phase II inspections are approximately 90 percent complete. Results from the Phase II inspections that have been completed seem to indicate uniform implementation of the initiatives.

Enclosure:
Attendance list

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NEI provided an update of Underground Piping and Tanks Initiative activities including initiative changes, treatment of outliers and overall implementation status. The NEI presentation indicated that all plants have met the Initiative milestones to date and are on track to meet future milestones. There was a discussion about the role of the initiative at plants that permanently shut down. The industry indicated that those plants would cease to be participants in the initiative once they declared that they had permanently ceased operations. This was a change from previous guidance that those plants would continue to be subject to the initiative until the decommissioning plan is implemented. Industry is still defining the timing of the transition.

INPO described its assessment role and summarized industry performance and findings with respect to the initiatives. INPO provided a historical overview of inspection findings and recommendations, and also summarized currently available operating experience.

EPRI discussed progress and plans related to development and deployment of nondestructive examination equipment, processes and procedures. Highlights included descriptions of buried pipe inspection technology, tank inspection technology, guided wave for direct inspections, future research plans and currently available publications.

A representative of the American Society of Mechanical Engineers (ASME) discussed the status of Section XI buried piping activities, including plans and progress in the "Task Group Buried Component Inspection and Testing." This task group is developing potential changes to the ASME Boiler and Pressure Vessel Code to address inspection, testing, mitigation, repair, replacement and design of buried and underground piping.

A representative of NACE International described ongoing activities in NACE Task Group 404, "Nuclear Buried Piping," to develop buried piping inspection, assessment and corrosion prevention standards optimized for nuclear power plant applications.

The following action items were recorded at previous meetings, with the current status noted:

- 1) NRC and EPRI staff will exchange information on saturated eddy current examination (ongoing).
- 2) NEI, INPO and NRC will discuss changing the graphical depiction of industry events such as leaks and significant degradation with the objective of more effectively demonstrating trends in the performance of piping and tanks that are safety related or contain radiologic or environmentally hazardous materials (ongoing).
- 3) NRC and NEI to discuss examples of regulatory methods used in some previous applications for qualification or demonstration of NDE techniques (ongoing).

The following new action items were recorded at this meeting:

1. Industry will provide more details about the industry process to formally transfer licensee jurisdiction of the underground components from the underground piping and tanks initiative to the decommissioning transition plan.
2. EPRI will ensure the relationship between license renewal and the initiative will be discussed at the Buried Piping Integrity Group meeting in July, 2014.

3. The industry will provide feedback to the NRC about whether the guided wave guidance document will be published in time to be considered for incorporation into the next revision of interim staff guidance on buried and underground piping.

The next meeting is tentatively scheduled for mid-January, 2015, at NRC headquarters.

- 3) The industry will provide feedback to the NRC about whether the guided wave guidance document will be published in time to be considered for incorporation into the next revision of interim staff guidance on buried and underground piping.

The next meeting is scheduled for mid-January, 2015, at NRC headquarters.

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