

History of Buried Piping Integrity Initiative

Jim Riley, NEI

Initial Industry Activities

- Industry meeting in September to evaluate possible actions to address leakage from buried piping
- Why take action?
 - Public confidence is important for operation of existing plants and support for new plants
 - Important to effectively manage the asset
 - Important to maintain regulatory confidence
 - Unique aspects led to a separate Initiative

Initiative Development

- Recommendations
 - NSIAC (Nuclear Strategic Issues Advisory Committee) Initiative to cover all buried piping
 - Procedures and oversight
 - Prioritization through risk ranking
 - Inspections
 - Asset management plan
 - Develop an NEI Guideline to supplement existing guidance and guide Initiative implementation

Understanding an NSIAC Initiative

- NSIAC is an NEI standing committee whose members include the CNO of every utility operating a nuclear power plant in the US
- Initiative is a formal commitment between CNOs to follow a defined policy or plan of action
 - Regulatory credibility
- Passing an Initiative requires 80% approval
 - Buried Piping Integrity Initiative was approved unanimously (100%) on November 18, 2009

Buried Piping Integrity Initiative

- Goal
 - Reasonable assurance of structural and leakage integrity of buried piping
- Scope
 - All NEI U.S. member utilities
 - All buried piping associated with each of their nuclear power plant sites.
- Expectations
 - Demonstrated by an improving trend in consequential leaks from buried piping across the industry.
 - Utilities will
 - Participate in the industry organizations that support and oversee implementation
 - Ensure that the buried piping activities are implemented at its plants
 - Industry organizations will cooperate in the manner described in this guideline.

Subsequent Industry Activities

- Formed Buried Piping Integrity Working Group and Task Force
- Issued NEI Guideline (NEI 09-14)
 - Text of the Initiative
 - Intent of the Initiative
 - Roles and responsibilities
 - NSIAC report
- Developing guidance on “reasonable assurance” of buried piping integrity
- Continuing meetings with NRC to update Initiative status and industry activities

Future Industry Activities

- Utilities
 - Implement Initiative
 - Support industry activities
- NEI
 - Continue NRC engagement
 - Periodic meetings of the Buried Piping Integrity Task Force to evaluate Initiative implementation and OE
 - Possible revision to NEI 09-14 to capture lessons learned
- EPRI
 - Support implementation through BPIG and BOPC
 - Develop inspection technology and resource materials
- INPO
 - Continue focus area

Buried Piping Integrity Task Force

- Maria Korsnick, executive sponsor, Constellation
- Chris Burton, utility lead, FENOC
- Joe Abisamra, Entergy
- Bill Campbell, Constellation
- Ila Collins, TVA
- Rudy Gil, FPL
- Sharon Gray, SNC
- Richard Hall, Exelon
- Glen Schinzel, STARS
- Joe Sears, INPO
- David Smith, Duke
- Joe Terrell, Progress
- Bill Wendland, ANI
- Bo Clark, EPRI
- Jim Riley, NEI lead