

November 18, 2010

MEMORANDUM TO: Michele G. Evans, Director
Division of Component Integrity
Office of Nuclear Reactor Regulation

FROM: Robert O. Hardies, Senior Level Advisor */RA/*
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Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF CATEGORY 2 PUBLIC MEETING BETWEEN THE
U.S. NUCLEAR REGULATORY COMMISSION AND INDUSTRY
REPRESENTATIVES TO DISCUSS THE PROGRESS ON THE
INDUSTRY'S BURIED PIPING INTEGRITY INITIATIVE

On September 21, 2010, the Nuclear Regulatory Commission (NRC) staff held a Category 2 public meeting with representatives from the Nuclear Energy Institute (NEI) and other industry representatives at the Legacy Hotel Meeting Center in Rockville, MD. This meeting was one in an ongoing series of meetings between NRC staff, industry representatives and other stakeholders to understand the scope and schedule for industry activities related to degradation of buried piping. Minutes of previous meetings are available at Agencywide Document Access and Management System (ADAMS) Accession Numbers ML093070162 and ML100810295. A list of meeting attendees is enclosed. The meeting notice is available at ADAMS Accession Number ML102640007. Portions of the meeting were proprietary and closed to the public.

At the beginning of the meeting, NRC staff presented an overview of the NRC's Buried Piping Action Plan. The NRC slides presented at the meeting are available at ADAMS Accession Number ML102660179. The staff described the action plan activities, schedule for action, and reiterated the objectives with respect to buried piping: the safety-related function of buried piping continues to be maintained and any releases of radioactive material from buried piping remain well below NRC regulatory limits. Current regulations and industry activities remain compatible with those objectives. The staff will continue to monitor operating experience to verify the objectives are being met. The action plan is periodically revised to reflect completion of activities or if re-sequencing is required. On September 14, 2010, revision 1 of the action plan was issued and was posted to the NRC public website (<http://www.nrc.gov/reactors/action-plans/nrr-task-action-plans.html>).

The industry began its presentations by reviewing the implementation status of the current Buried Piping Integrity Initiative dated November 20, 2009, (ADAMS Accession Number ML102660132) followed by a description (ADAMS Accession Number ML102660138) of "Guidelines for the Management of Piping Integrity," the Nuclear Energy Institute (NEI) buried piping initiative administrative document NEI 09-14.

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The industry described their plans for revising the Buried Piping Integrity Initiative. Their review of operating experience demonstrated that degradation of piping in vaults and tunnels (which were not within the scope of the Buried Piping Integrity Initiative) can occur. They also noted that the original initiative did not include tanks. A proposed Underground Piping and Tank Integrity Initiative was approved by the Nuclear Strategic Issues Advisory Committee in September 2010. This new initiative includes all of the objectives and schedules from the scope originally covered in the Buried Piping Integrity Initiative and adds a modified scope and schedule for underground piping and tanks. The presentation is provided in ADAMS Accession Number ML102660136. The new initiative was not published prior to the meeting but was issued a week later and is available in ADAMS Accession Number ML102730367. There are plans to revise NEI 09-14 to address lessons learned and added scope. The staff expressed an interest in receiving NEI 09-14, which NEI provided by letter on November 3, 2010 (ADAMS Accession Number ML103090142).

In the next presentation (ADAMS Accession Number ML102660146), the industry described their plans and schedule for providing the information to the NRC in response to a letter from the NRC (ADAMS Accession Number ML102300270) dated August 18, 2010, to NEI requesting information related to degradation of buried piping and the Buried Piping Integrity Initiative. The industry indicated they would provide the requested information, and that they would propose (and provide) a schedule to deliver the information in the first quarter of 2011.

Finally, the industry provided an overview of their risk ranking process. Before the meeting the industry indicated they would be presenting proprietary information during this session, so this part of the meeting was conducted as a proprietary meeting. Subsequent to the meeting the industry determined that the discussion of the subject matter contained proprietary information but the presentation did not have any proprietary content. Accordingly, they provided their slides (ADAMS Accession Number ML102660150).

During the meeting NRC staff made the following requests or comments:

- 1) Staff requested to be provided with NEI 09-14 for information, which NEI provided on November 3, 2010.
- 2) Staff requested to be provided with the periodic Nuclear Strategic Issue Advisory Committee reports that summarize progress related to the piping and tanks initiatives. The industry indicated they would consider providing these reports.
- 3) Staff requested to be provided with the new initiative when it is published. NEI provided the new initiative on September 27, 2010.
- 4) Staff requested a response to its August 18, 2010 letter to NEI. The industry indicated they planned to issue a response that included a description of the information they planned to provide and a schedule for providing it.
- 5) There was insufficient time in this meeting to address risk ranking in the level of detail necessary for the staff to understand the consistency and scope of the risk ranking processes. In particular, the staff is interested in how consistently a single set of piping systems would be rated by the spectrum of risk ranking software products or other processes used by licensees. The staff will continue to work with industry to understand the risk ranking processes. Some of these interactions may be proprietary.

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- 6) The staff inquired about how the transition is made from the risk ranking process to the inspection planning process. In particular, the staff is interested in learning whether consistent protocol will be established for selecting components or sections for inspection. The industry agreed that this would be a topic for future discussions.

Enclosure:

As stated

- 6. The staff inquired about how the transition is made from the risk ranking process to the inspection planning process. In particular, the staff is interested in learning whether consistent protocol will be established for selecting components or sections for inspection. The industry agreed that this would be a topic for future discussions.

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