

**NEI 09-14 [Rev 1]**

**GUIDELINE FOR THE  
MANAGEMENT  
OF UNDERGROUND  
PIPING AND TANK  
INTEGRITY**

**December 2010**



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**Nuclear Energy Institute**

**Guideline for the  
Management of  
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## **REVISION SUMMARY**

<b>Revision</b>	<b>Description of Changes</b>
0	Initial issue
1	Extensive revision. Most significant changes: <ul style="list-style-type: none"><li>• Included text and intent of the Underground Piping and Tank Integrity Initiative</li><li>• Included “shall” statements to designate expectations that must be met or deviations from them justified</li><li>• Added “Definitions” (Section 4)</li><li>• Added an expectation that significant inspection findings and new operating experience related to underground piping and tanks be communicated to NEI (Section 5.1)</li><li>• Expanded the explanation of the intent of the Initiative and included clarifications of the Initiative scope (Section 6)</li><li>• Expanded guidance for justifying deviations from the Initiative (Section 6.2.6)</li><li>• Added Appendix B, a summary of the Initiative requirements in NEI 09-14</li></ul>

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# **GUIDELINE FOR THE MANAGEMENT OF UNDERGROUND PIPING AND TANK INTEGRITY**

## **1 BACKGROUND**

This Guideline for the Management of Underground Piping and Tank Integrity describes the policy and practices that the industry commits to follow in managing underground piping and tanks. The Underground Piping and Tanks Integrity Initiative supersedes the Buried Piping Integrity Initiative; it incorporates all of its elements and adds additional scope and milestones.

The Buried Piping Integrity Initiative was approved by NSIAC (Nuclear Strategic Issues Advisory Committee) in November 2009. When the Buried Piping Integrity Initiative was approved, the scope was limited to piping that was in direct contact with the soil due to the inability to directly inspect this piping and due to the potential impact on the environment and public confidence if leakage occurred. However additional operating experience has shown that piping that is below grade and is not in direct contact with the soil and underground tanks can also degrade with potential adverse consequences. As a result, the Underground Piping and Tanks Integrity Initiative was developed to incorporate and expand upon the Buried Piping Integrity Initiative: its scope also includes selected underground piping that is not in direct contact with the soil and specified underground tanks. The key milestone implementation dates in the Underground Piping and Tanks Integrity Initiative were established to reflect the added initiative scope and its effect on the station resources that will be required to add these items into existing programs. The Underground Piping and Tanks Integrity Initiative was approved by NSIAC in September 2010.

Utility implementation of the Initiative will be verified as directed by the NSIAC.

This guideline contains the following information:

- The text and scope of the Underground Piping and Tanks Integrity Initiative (the “Initiative”).
- The goals that drive the Initiative.
- Key definitions.
- Roles and responsibilities established to ensure implementation of the Initiative.
- Explanation of the intent of the Initiative.
- Insights for effective and consistent implementation within the industry.
- The content of the report to NSIAC on progress of implementing the Initiative.

The approach to addressing underground piping and tank issues embodied in this Initiative compliments the expectations in place under the Ground Water Protection Initiative, which was approved by NSIAC in 2006 and which remains in effect (guidance on implementation

of the Ground Water Protection Initiative is provided in NEI 07-07, *Industry Ground Water Protection Initiative, Final Guidance Document* (Reference 3). The Underground Piping and Tanks Integrity Initiative focus is on assessing in-scope components in order to provide reasonable assurance of their continued structural and leakage integrity with special emphasis on licensed materials. The focus of the Ground Water Protection Initiative (GPI) is on improving the management of situations involving inadvertent radiological releases that get into ground water and the communications with external stakeholders about those events. Integral to the Ground Water Protection Initiative is an evaluation of the potential for unintended leaks of licensed materials resulting from work activities and components that contain or could contain licensed material, including some components that are within the Underground Piping and Tanks Integrity Initiative scoping. In addition, under the GPI, early detection measures are established. If licensed material is detected by early detection measures, plant personnel are expected to appropriately investigate, remediate and communicate with external stakeholders. Utilities should establish governance to ensure that the activities under the two Initiatives are communicated and coordinated.

## 2 INTRODUCTION

Underground piping and tanks are used in several applications at plants with different governing requirements:

- safety related pipe and tanks
  - governed by plant Technical Specifications and ASME Code,
- non-safety related pipe and tanks containing licensed material in liquids or gases
  - governed by NRC regulations and within the scope of NEI's Ground Water Protection Initiative
- other pipes and tanks in non-safety related systems containing water, fuel oils, gases or other media
  - may be governed by local, State and EPA regulations.

The material condition of underground piping and tanks may not be fully characterized, and one of the means of protecting buried components, cathodic protection, may not have been properly maintained at some stations. In recent years, some self revealing leaks have occurred that could impact public confidence, regulatory margin, and, in some cases, plant operation. Additional impacts that could occur if performance is not improved could be:

- safety and operational challenges
- environmental impacts
- increased regulatory requirements for new and existing plants
- EPA violations with stakeholder or media interest
- license renewal delays
- heightened public opposition to new plant construction

As noted in the executive endorsement of this initiative, the leaders in the nuclear industry recognize that additional industry action directed at assessing the condition of underground piping and tanks within the nuclear fleet is warranted. Implementation of an assessment program for underground piping and tanks is designed to limit the potential for unintended leaks or integrity breaches. The industry's goal is to proactively address the integrity of underground piping and tanks and where possible, prevent leakage before it occurs using available technologies and other control and evaluative processes. To assure consistent and measured progress in this area an NSIAC Initiative addressing underground piping and tank integrity was approved to commit commercial nuclear power plants to specific program elements. The scope of the Underground Piping and Tanks Integrity Initiative includes selected piping and tanks on the site that are below grade and outside of buildings.

The EPRI Document “*Recommendations for an Effective Program to Control the Degradation of Buried Pipe*” (Reference 1) provides important additional considerations for successful implementation of the buried piping aspect of the Initiative.

NSIAC provides oversight of industry implementation of the Underground Piping and Tanks Integrity Initiative. Periodic reports will be prepared for NSIAC addressing:

- Progress on implementation of the elements of this initiative and any deviations.
- Industry experience and lessons learned.
- Progress of technology development.

Specific guidance on the periodic report is included in Appendix A.

### **3 INDUSTRY INITIATIVE ON UNDERGROUND PIPING AND TANK INTEGRITY**

The Buried Piping Integrity Initiative was approved by NSIAC in November 2009. An extension of the Buried Piping Integrity Initiative that addresses selected underground piping and tanks was approved in September, 2010. The revised Initiative is known as the Underground Piping and Tanks Integrity Initiative.

The expected actions and milestone dates relevant to a given component depend upon whether the component was in the original scope of the Buried Piping Integrity Initiative or in the scope of the revised and renamed Underground Piping and Tanks Integrity Initiative.

#### **3.1 SCOPE**

The scope of the Underground Piping and Tanks Integrity Initiative includes the following.

##### **A. Those within the scope of the original Buried Piping Integrity Initiative:**

- All piping that is below grade and
  - Contains any fluid and
  - Is in direct contact with the soil

##### **B. And the following additional components:**

- Underground piping and tanks that are outside of a building and below grade (whether or not they are in direct contact with the soil) if they
  - Are safety related
  - Or -
  - Contain licensed material or are known to be contaminated with licensed material.

#### **3.2 INITIATIVE GOAL**

The goal of the Underground Piping and Tanks Integrity Initiative is to provide reasonable assurance of structural and leakage integrity of in-scope underground piping and tanks with special emphasis on piping and tanks that contain licensed materials.

The Underground Piping and Tanks Integrity Initiative will:

- Drive proactive assessment and management of the condition of piping and tanks that fall within the Initiative scope.
- Ensure sharing of industry experience.
- Drive technology development to improve available techniques for inspecting and analyzing underground piping and tanks.

- Improve regulatory and public confidence in the industry's management of the material condition of its underground tanks and piping systems.

### 3.3 INITIATIVE ACTIONS

In order to meet these goals, every utility shall implement measures or program(s) to satisfy the elements and associated key attributes in Sections 3.3.A and B. The language in Sections 3.3.A and B below documents the text of the Underground Piping and Tanks Initiative as approved by NSIAC.

#### A. Original Buried Piping Integrity Initiative Elements

The components governed by the original Buried Piping Integrity Initiative are described in Part A of Section 3.1 (Scope). The following elements, attributes, and milestones were established by the original Buried Piping Integrity Initiative when it was approved in November 2009. The EPRI document "*Recommendations for an Effective Program to Control the Degradation of Buried Pipe*" provides additional details on these elements and attributes.

Some changes are included in the Initiative description below (as compared to the version approved in November 2009) to clarify meaning, but their intent is unchanged and they remain in effect under the Underground Piping and Tanks Integrity Initiative.

#### 1. Procedures and Oversight – By June, 30, 2010:

- Ensure clear roles and responsibilities including senior level accountability for the Buried Pipe Integrity Program.
- Develop a Buried Pipe Integrity Program document and implementing procedures.

#### 2. Risk Ranking – Risk Rank buried piping segments by December 31, 2010. Risk Ranking shall incorporate the following attributes:

- Pipe function
- Pipe locations and layout
- Pipe materials and design
- Health of cathodic protection systems, if applicable
- Based on the above data and other information, determine:
  - The likelihood of failure of each piping segment
  - The consequences of failure of each piping segment
- A means to update the risk ranking as necessary
- A database to track key program data, inspection results, and trends



3. **Inspection Plan** – By June 30, 2011, develop an inspection plan to provide reasonable assurance of integrity of buried piping. This plan shall include the following key attributes:
  - Identification of piping segments to be inspected
  - Potential inspection techniques
  - Inspection schedule for buried piping segments based on risk ranking
  - Assessment of cathodic protection, if applicable
4. **Plan Implementation** – Implementation of the Inspection Plan shall start no later than June 30, 2012. The condition assessment of buried piping containing radioactive material shall be completed by June 30, 2013.
5. **Asset Management Plan** – Inspection results shall be used as input to the development of an asset management plan for buried piping. This plan shall receive a high level of review and approval and will be in place by December 31, 2013.

## **B. Underground Piping and Tanks Integrity Initiative Elements**

The components falling within the scope of the Underground Piping and Tanks Integrity Initiative are described in Part B of Section 3.1 (Scope). The elements, attributes, and milestones described below are established for the additional scope of the Underground Piping and Tanks Integrity Initiative.

1. **Procedures and Oversight** – By December 31, 2011
  - Identify the plant programs or measures that manage the material condition of components within the scope of the Underground Piping and Tanks Integrity Initiative.
  - Establish the necessary controls and implementing process to coordinate the applicable programs and measures and ensure they meet the intent of the Initiative.
  - Establish clear roles and responsibilities including senior level accountability for implementation of the Underground Piping and Tanks Integrity Initiative.
2. **Prioritization** – Prioritize underground piping and tanks by June 30, 2012. Prioritization shall consider the following attributes:
  - Function
  - Locations and layout
  - Materials and design
  - Process fluid
  - Health of cathodic protection systems, if applicable

- Based on the above data and other information, determine:
    - The likelihood of failure of each component
    - The consequences of failure of each component
  - A means to update the prioritization scheme as necessary
  - Process(es) to allow retrieval of key program data
3. **Condition Assessment Plan(s)** – By December 31, 2012 develop or identify existing condition assessment plans that will provide reasonable assurance of integrity of components within the additional scope of the Underground Piping and Tanks Integrity Initiative. These plans shall include the following key attributes:
- Identification of underground piping and tanks to be assessed
  - Potential assessment techniques
  - Assessment schedules that take into account the relative priority of components. This schedule should be coordinated with the schedule developed for the original Buried Piping Integrity Initiative to ensure that the components with the highest overall priority are addressed first.
  - Assessment of cathodic protection, if applicable
4. **Plan Implementation** – Implementation of the Condition Assessment Plan for underground piping and tanks shall start no later than June 30, 2013. The condition assessment of underground piping and tanks containing radioactive material shall be completed by June 30, 2014.
5. **Asset Management Plan** – Inspection results shall be used as input to the development of asset management plans for components within the scope of the Underground Piping and Tanks Integrity Initiative. These plans shall receive a high level of review and approval and will be in place by December 31, 2014.

### 3.4 EXPECTATIONS

The expected outcome of the Underground Piping and Tanks Integrity Initiative is improved regulatory and public confidence in:

- The Industry's management of the material condition of its underground tanks and piping systems and
- The appropriateness of actions taken to establish reasonable assurance of their structural and leakage integrity.

Significant leaks from underground piping and tanks across the industry will be trended as a means of determining the Initiative's affect on the condition of these components.

In order to meet the goals of the Initiative, every utility should engage in industry activities (such as the Buried Piping Integrity Group) that support implementation of the Underground Piping and Tanks Integrity Initiative.

Industry organizations (EPRI, ANI, INPO, and NEI) cooperate in the manner described in this guideline and provide the information necessary to prepare periodic updates to NSIAC.

### **3.5 REQUIREMENTS**

Every utility shall ensure that activities associated with the Underground Piping and Tanks Integrity Initiative and this document are implemented at its nuclear power plants in accordance with the intent of the Initiative and the implementation dates specified therein. Whenever the word “shall” is used in this document it indicates an action that is required under the Buried Piping and Tanks Integrity Initiative. If a plant cannot or will not implement any part of the Initiative (Sections 3.3.A and B) or a “shall” statement in this document, a justification for deviation from the Initiative shall be developed and processed in accordance with Sections 6.2.1 and 6.2.6.

Appendix B captures all the required elements of this document. Users should not rely on this appendix alone, but should read the document to ensure that the context of the requirements is fully understood.

## **4 DEFINITIONS**

### **4.1 ACCESSIBLE**

Piping and tanks that can be routinely observed without the required support of special tools or other assistance. Activities that would indicate inaccessibility include removal of security devices or manways, use of lifting rigs, and performance of excavation, or modification of building structures, armored embedments or encasements.

### **4.2 ADVERSE INSPECTION FINDINGS**

Indications from inspections that require immediate repair or repair within one cycle.

### **4.3 BELOW GRADE**

Locations below standard ground elevation as defined at the station.

### **4.4 BURIED PIPING**

Piping that is below grade and in direct contact with the soil.

### **4.5 ENVIRONMENTALLY HAZARDOUS MATERIALS**

Materials that are subject to EPA or EPA-authorized State regulations or that are specifically addressed in a plant's environmental program(s).

### **4.6 FAILURE**

Unexpected system leakage or loss of structural integrity of piping or a tank.

### **4.7 FLUIDS**

Fluids include both liquids and gases (including instrument air).

### **4.8 LICENSED MATERIAL**

Licensed material (from 10 CFR 20.1003) (or licensed radioactive material as used in this document) means source material, special nuclear material, or byproduct material received, possessed, used, transferred or disposed of under a general or specific license issued by the Commission. Components containing licensed material covered under NEI 09-14 should be

consistent with those identified in NEI 07-07 (Reference 3) – see the discussion under scope for additional clarification.

#### **4.9 OUTSIDE OF A BUILDING**

A component is outside of a building if it is beyond the outside surface of all exterior walls and floors in the building.

#### **4.10 PIPING SEGMENT**

Portions of buried piping systems that are grouped together for risk ranking purposes based on similarities such as installation, manufacture, or environmental conditions. Some risk ranking methods may use other terms to refer to piping segments, such as zones.

#### **4.11 PRIORITIZATION**

The process of assigning relative importance of scoped components as determined by a set of parameters that reflect design and in situ conditions. The intent of the word “prioritization” as used in this document is to imply a process that is less formal than risk ranking.

#### **4.12 RUN TO FAILURE**

A strategy focused on repairing piping or tanks after leakage is discovered as opposed to assessing these items over time with the goal of preventing leakage.

#### **4.13 SAFETY RELATED**

Structures, systems, and components that are relied upon to remain functional during and following design basis events to ensure the integrity of the reactor coolant pressure boundary, the capability to shut down the reactor and maintain it in a safe shutdown condition, or the capability to prevent or mitigate the consequences of accidents that could result in potential offsite exposure comparable to the guidelines in 10CFR50 section 34(a)(1), 67(b)(2) or 10CFR100.11.

#### **4.14 SIGNIFICANT LEAKAGE**

Leaks which meet any of the following criteria

- Result in concentrations that could exceed the regulatory concentrations or limits established by the NRC or EPA, or
- Result in voluntary communication under the industry Ground Water Protection Initiative, or
- Result in the system or component being out of service

#### **4.15 TANK**

A fully enclosed stationary vessel used to hold or store fluids for distribution. Tanks are constructed primarily of non-earthen materials (e.g., wood, concrete, steel, or plastic) which provide structural support. Tanks do not include basins, ponds or reservoirs.

#### **4.16 TUNNEL**

A structure that is outside of a building, below grade, designed to accommodate personnel, and not routinely accessible.

#### **4.17 UNDERGROUND TANK**

All tanks that are outside of buildings and sufficiently below grade such that there is a reasonable possibility that leakage from inaccessible portions of the tank may not be detected. Detection can be accomplished by direct observation or by instrumentation that is capable of reliably detecting leakage before it becomes significant (see definition of Significant Leakage). The tanks may be in direct contact with concrete or located in trenches, underground vaults or tunnels. Within the context of this Initiative, underground tanks include abandoned tanks connected to active systems. *(Note that the word “underground” has a different meaning when used within the context of the Underground Piping and Tanks Integrity Initiative as compared to its meaning when used within the NRC’s Generic Aging Lessons Learned report (GALL, NUREG 1801). Chapter IX of GALL defines underground as below grade and not in direct contact with the soil. NEI 09-14 defines underground as including both components that are buried (in direct contact with the soil) plus those that are not indirect contact with the soil.)*

#### **4.18 UNDERGROUND PIPING**

All piping that is below grade, not accessible, and outside of buildings. Buried piping (below grade and in direct contact with the soil) is considered to be a subset of underground piping. *(Note that the word “underground” has a different meaning when used within the context of the Underground Piping and Tanks Integrity Initiative as compared to its meaning when used within the NRC’s Generic Aging Lessons Learned report (GALL, NUREG 1801). Chapter IX of GALL defines underground as below grade and not in direct contact with the soil.)*

#### **4.19 VAULT**

A structure that is outside of a building, below grade, not designed to accommodate personnel and not routinely accessible.

## **5 INDUSTRY ROLES AND RESPONSIBILITIES**

This guideline will be implemented through the activities outlined below. These activities have the following intended purpose:

- Implementing the Underground Piping and Tanks Integrity Initiative
- Supporting the intent of the Initiative
- Verifying implementation of the Initiative through maintenance and monitoring of a set of metrics described in the report to NSIAC (Appendix A)
- Ensuring that operating experience related to underground piping and tank integrity is communicated
- Continuing research to identify and develop new techniques for inspection and maintenance/replacement of buried piping and tanks

### **5.1 UTILITIES**

Utilities shall perform the following actions in support of the Initiative:

- Implement the actions required by the Initiative (Section 3.3 and all “shall” statements in this document).
- Process a justification for deviation (Section 6.2.6) whenever an action required by the Initiative or a “shall” statement in this document cannot be met.
- Report all results from inspections performed in accordance with the Initiative in the manner proscribed by the EPRI project manager responsible for the Buried Piping Integrity Group.
- Report to NEI the status of meeting the Initiative Implementation dates and any active deviations that do not meet the intent of the Initiative as required for the report to NSIAC (Appendix A)
- Report to INPO (EPIX) occurrences of leakage or adverse inspection findings in piping, and tanks within the scope of this Initiative as required for the report to NSIAC (Appendix A)

In order to meet the intent of the Initiative, utilities should:

- Participate in the industry programs that support the Initiative
- Contribute technical resources and executive leadership to industry efforts
- Communicate questions regarding the intent of the Initiative or the interpretation of this guideline to the Buried Piping Integrity Initiative Task Force. If a question relates to the text of the Initiative or a “shall” statement in this guideline, task force feedback on the questions would typically precede the development of a justification for deviation.

- Communicate instances of significant leakage or adverse inspection findings of piping and tanks within the scope of the Initiative to the NEI and the EPRI Buried Piping Integrity Group Project Managers in a timely manner for the purpose of rapid dissemination of preliminary operating experience and to request immediate assistance as needed.

## **5.2 EPRI**

EPRI performs the following functions in support of the Initiative:

- Support the real time assessment of operating experience as reported by utilities.
- Collect underground piping and tank inspection data obtained from utilities and evaluate its implications annually.
- Manage the research necessary to improve inspection technology for underground piping and tanks
- Support repair/replacement technology as appropriate
- Provide a venue for identifying research and development needs, sharing operating experience, and other issues that have the potential for impact on the industry
- Compile and report to NEI the information necessary to make periodic reports to NSIAC (Appendix A) on progress in the development of inspection technology

## **5.3 INPO**

INPO performs the following functions in support of the Initiative:

- Incorporate within their plant evaluations a review of buried/underground piping and tank programs as applicable. The review should include piping and tanks that may not be safety related but are important to safety or contain potentially radiologically contaminated fluids.
- Communicate operating experience relative to underground piping and tank integrity issues and other relevant information to the industry.
- Compile and report to NEI the operating experience information necessary to make periodic reports to NSIAC (Appendix A).

## **5.4 ANI**

ANI performs the following function in support of the Initiative:

- Report significant recommendations from inspections related to underground piping and tank integrity and observations on Initiative implementation to NEI in support of the periodic report to NSIAC (Appendix A).



## 5.5 NEI

NEI performs the following functions in support of the Initiative:

- Manage the industry's regulatory interface on underground piping and tank issues of generic regulatory significance.
- Manage the operation of the Buried Piping Integrity Working Group and Task Force. Task Force responsibilities include:
  - Addressing questions regarding the interpretation of the Initiative
  - Judging whether deviations from Initiative requirements meet the intent of the Initiative
  - Evaluating important operating experience
  - Evaluating the overall status of Initiative implementation as part of the report to NSIAC
- Communicate information relative to the Underground Piping and Tanks Integrity Initiative to the industry.
- Compile the information necessary to make periodic reports to NSIAC (Appendix A) on implementation of the Initiative.
- Communicate the periodic report to NSIAC on implementation of the Underground Piping and Tanks Integrity Initiative, industry operating experience, and inspection technology developments (Appendix A).
- Coordinate activities with utilities, EPRI, ANI, and INPO.

## **6 INTENT OF THE UNDERGROUND PIPING AND TANKS INTEGRITY INITIATIVE**

The following sections describe the activities and commitments that implement the Initiative actions presented in Section 3.3 of this document. Additional activities may also be necessary as industry experience and technology evolves.

Additional information on the intent of the Initiative is provided by EPRI document, “Recommendations for an Effective Program to Control the Degradation of Buried Pipe” (Reference 1). Although verbatim compliance with the EPRI guideline is not a commitment under the Initiative, the EPRI guidance forms the basis for the Initiative and provides additional details on the Initiative’s attributes and elements. References to the applicable sections of the EPRI document, where applicable, are provided in the descriptions in Section 6.2.

### **6.1 UNDERGROUND PIPING AND TANKS INTEGRITY INITIATIVE SCOPE**

The following are clarifications and explanations of the intent of the scope of the Initiative:

- In general, the piping and tanks that are subject to the Underground Piping and Tanks Integrity Initiative are determined by starting with the total population of utility owned piping and tanks within the site boundaries and adjusting this population using the scope statement in section 3.1 and the clarifications in this section. This will result in some low consequence components such as those associated with water and sewage treatment facilities and storm drains to be subject to the Initiative, but the components may not need to be inspected if categorized as “run to failure”.
- Abandoned piping and tanks that are drained, not connected to an active system, and that are not known to be contaminated with licensed material are not within the scope of the Initiative.
- Piping and tanks that are below grade are excluded from the scope of the Initiative if they are accessible for direct inspection (see definition of Accessible).
- Portions of piping systems that are contained within building walls or basemats are not considered “underground” and are not within the scope of the Initiative.
- Underground piping includes buried piping, and piping in vaults, trenches, tunnels, beneath buildings, or encased in concrete.
- Piping owned by others that runs inside of the owner controlled area is not within the scope of the Initiative.
- If a vault is not accessible from inside a building, piping or tanks within the vault are considered outside of the building and within the scope of the Initiative even if the vault shares a wall with the building.

- Owner's piping located outside of the owner controlled area is not within the scope of the Initiative unless it is safety related or contains licensed material.

Licensed material (from 10 CFR 20.1003) means source material, special nuclear material, or byproduct material received, possessed, used, transferred or disposed of under a general or specific license issued by the Commission. 10 CFR 20.1003 . The term "licensed material" as used in this document is intended to be consistent with its meaning in the Ground Water Protection Initiative (NEI 07-07, Reference 3, Objective 2.2, Source Containing Licensed Material). Consistent with Regulatory Issue Summary RIS 2008-03 "Return/Re-use of Previously Discharged Licensed Material" "licensed material" as applied in the Underground Piping and Tank Integrity Initiative does not include the concentration(s) of radioactive material previously released as a controlled, planned airborne or liquid radioactive effluent when it is returned to the facility in concentrations below the exempt concentration limits in 10 CFR 30.

## **6.2 UNDERGROUND PIPING AND TANKS INTEGRITY INITIATIVE IMPLEMENTATION**

The goal of the Underground Piping and Tanks Integrity Initiative is to provide reasonable assurance of structural and leakage integrity of in-scope underground piping and tanks with special emphasis on components that contain licensed materials. The concept of reasonable assurance within the context of the Initiative means establishing and maintaining confidence in underground piping and tank integrity based on engineering judgment supported by facts, actions, knowledge, experience, and/or observations. It defines a level of confidence which is deemed to be adequate to support a particular position.

The approach used to establish reasonable assurance should include leakage prevention by means of inspection as a key part of its process. It should be systematic and based on defined programs and processes that produce consistent results. The approach should be documented and supported by engineering evaluation, governing procedures, and risk ranking. It should be continuously validated by the results of examinations and fitness-for-service evaluations, and by the experience gained from required repairs and applied mitigation methods.

Although the Underground Piping and Tanks Integrity Initiative will provide a high level of confidence in the integrity of underground piping and tanks, it is not possible to guarantee that there will be no leakage or no structural degradation in these components. This initiative is intended to reduce the probability and consequences of underground piping and tank issues as low as reasonably achievable.

Some utilities include tanks in the same program as buried piping and some have separate programs for tanks. The objective of the Underground Piping and Tanks Integrity Initiative is not to dictate a specific approach; rather it is to ensure that by whatever means utilities manage these components, the applicable guidance in the programs meet the intent of the Initiative as explained in this document.

## **A. Activities within the Buried Piping Integrity Initiative Scope**

### **6.2.1 Procedures and Oversight**

The necessary governance and oversight responsibilities shall be in place by June 30, 2010. These include the procedures and oversight elements in section 3.3 and the following items.

- Clear lines of responsibility  
The Buried Piping Integrity Program shall be established including the identification of a responsible executive who will carry out the senior level functions specified in the Initiative and this guideline.
- Process for justifying and approving exceptions to the Initiative  
When a utility determines that a required element of the Initiative cannot be met, a technical justification for deviation shall be developed and retained with the utility's program documentation. The technical justification should provide the basis for determining that the proposed deviation meets the same objective, or level of conservatism exhibited by the original work product, and should clearly state how long the deviation will be in effect. Justifications for deviation shall be reviewed and approved in accordance with the applicable plant procedures with concurrence from the responsible utility executive.

Each utility shall report all approved justifications for deviation that are currently active at each of its plants to NEI semi-annually as part of the utility's input to the NSIAC report.

Note that the deviation process has been expanded in revision 1 of NEI 09-14. The entire process for justifying deviations is described in Section 6.2.6. The process in Section 6.2.6 will supersede the process in this section on December 31, 2011.

- Program Documents and Implementing Procedures  
A Program Plan and associated procedures shall be developed to implement the Underground Piping and Tanks Integrity Initiative. The program documents and implementing procedures shall implement, as a minimum, the elements of the Underground Piping and Tanks Integrity Initiative (Section 3.3) and requirements in this document. Guidance for the specific content of the program document may be obtained from Sections 1.4.1 and 1.4.2 in the EPRI document on buried piping, "Recommendations for an Effective Program to Control the Degradation of Buried Pipe (Reference 1)."

### **6.2.2 Risk Ranking**

A risk ranking process shall be used to understand site vulnerabilities and to help prioritize the selection of inspection locations. Risk ranking is performed by determining the likelihood of failure of each segment of applicable piping and combining that failure probability with the consequences of failure of that item. Components with high likelihood of failure and high

consequences of failure should receive more attention than low ranked components. A description of a risk ranking process for buried piping is provided in Reference 1.

Risk Ranking may be performed using software tools; several different software tools are available for this application. This guideline does not recommend or discourage any software system; but, regardless of the tool that is used, utilities should review the risk ranking results to ensure they reflect relative system priorities and are appropriate from an engineering judgment perspective.

The risk ranking process shall incorporate the attributes listed in Section 3.3.A.2 of this document as augmented by the “shall” statement below as a minimum.

- The risk ranking shall be periodically reviewed and updated as necessary to reflect inspection results, changes in operating conditions, and design modifications.

The initial risk ranking process shall be complete by December 31, 2010.

The risk ranking process shall determine the likelihood and consequence of failure for each piping segment in order to prioritize inspections or other actions and should also consider the following:

- Soil analysis data, when available to assess the likelihood of OD corrosion
- The potential for ID (fluid-side) corrosion and fouling
- The “health” of the cathodic protection system. “Health” should be interpreted in the context of whether the system is performing its function as designed.
- Over the line survey results. These results help assess the likelihood of OD corrosion.
- Whether piping and tanks contain fluids with licensed material. The risk ranking process should place sufficient priority on these components such that the intent of the Initiative is met.
- The results of the Ground Water Protection Initiative risk ranking process. The NEI Ground Water Protection Initiative also contains a risk ranking process for systems, structures, and components, including underground piping and tanks, containing radioactive materials. The results of the Ground Water Protection risk ranking process should also be used as an input in inspection plan development.

### **6.2.3 Inspection Plan**

The goal of the inspection plan is to support an assessment of the pipe’s structural and leakage integrity and provide reasonable assurance that a piping segment will maintain this integrity between successive inspections. The results of risk ranking along with plant and industry experience, plant licensing commitments, and trending of past inspection data should be considered to define inspection locations, inspection methods, and inspection schedules (see reference 1). Other considerations such as access may also be considered when the relative risk rankings are similar.

The inspection plan shall incorporate the attributes listed in Section 3.3.A.3 of this document as augmented by the “shall” statement below.

- Where buried pipes are protected by a cathodic protection (CP) system, the CP system shall be periodically inspected and tested to assess its continued adequacy.

The inspection plan shall be in place by June 30, 2011.

Development of an inspection plan should consider the following:

- The capabilities of the inspection techniques used
- Industry and internal operating experience
- Piping design characteristics
- The condition of the piping inspected (if inspected previously)
- The results of risk ranking performed for the Ground Water Protection Initiative
- Contingency plans that include
  - Methods and criteria to assess the significance of inspection results considering the damage mechanism and licensing commitments.
  - Repair and replacement options
- Input from a coating specialist
- Whether a CP system should be added to systems containing materials susceptible to degradation.

Sampling techniques and engineering evaluations based on known conditions of piping are an acceptable means of achieving reasonable assurance.

#### **6.2.4 Plan Implementation**

Plan implementation should consist of performing a condition assessment based on both inspection results and engineering evaluations. The inspections should be conducted at the most vulnerable locations determined using methods such as the risk ranking, results of cathodic protection and coating surveys, plant experience, etc. The combination of evaluations and inspections performed should provide reasonable assurance that the piping segment will maintain structural and leakage integrity until the next planned inspection. The inspection results should be documented and relevant photographs or video, when taken, should be filed to support inspection results. All inspection results (whether degradation exists or not) shall be reported to EPRI in the manner proscribed by the Buried Piping Integrity Group project manager.

Buried piping segments whose failures are inconsequential, and would cause no direct or collateral damage (such as potable water), may be considered “run to failure” and dispositioned accordingly. Safety related lines and those containing licensed materials should never be characterized as “run to failure”. Reference 1 provides more guidance on this categorization.

Consider benchmarking piping segments characterized as “run to failure” against programs at other utilities to check for consistent application. Note that segments categorized as “run to failure” are still considered within the scope of the Initiative and leaks and adverse inspection findings in these segments shall be reported in accordance with Appendix A.

Implementation of the inspection plan shall start no later than June 30, 2012 and the condition assessment of buried piping containing licensed materials shall be completed by June 30, 2013.

Inspections should consider the following:

- Inspecting the coating when a buried pipe is uncovered
- Performing a visual inspection of buried pipe when it is uncovered or entered for any reason in order to look for evidence of corrosion or damage.
- In situations where system operability or functionality is in question due to wall or weld degradation, examining the piping to determine remaining thickness.
- Estimating a projection of future damage based on current inspection results and the time to the next planned inspection or repair.
- Categorizing the inspection results in support of a remaining life calculation.
- Using the knowledge gained through the inspection and integrity assessment process to review and adjust as necessary the risk-informed ranking and the inspection plan.

The results of condition assessments should be an input to the Asset Management Plan.

### **6.2.5 Asset Management Plan**

An asset management plan or plans addressing buried piping shall be developed and maintained. An asset management plan is a long range plan for managing the structural and leakage integrity of buried piping. Where the risk of failure is unacceptable, preventive and mitigative options should be implemented as part of the long range strategy.

The asset management plan for buried piping may be part of the overall site or fleet asset management plan.

The asset management plan should be a living document that is periodically reviewed and updated as more plant data becomes available through physical assessments and other means and as industry knowledge and technology evolve.

The asset management plan shall be reviewed and approved by an appropriate high level organization within the utility (such as the plant health committee).

The Asset Management Plan for buried piping shall be in place by December 31, 2013.

Key elements of an Assessment Management Plan should include:

- Inspection plans
- Planned maintenance activities
- Plans for repair
- Anticipated replacement

One method to develop an asset management plan would be to categorize each buried line based on its risk rank, contents (licensed material, diesel oil, raw or minimally treated water, hazardous chemicals, off gas, etc), importance to power generation, results of cathodic protection testing, and coating surveys, plant experience, etc. For example, each line would then be placed into categories such as:

- Components to be repaired or replaced with a planned schedule within an implementation plan.
- Components that need to be periodically inspected or monitored with a planned schedule.
- Components that are acceptable to run to leak and then repaired as needed (e.g., piping with low risk or low environmental impact. Plants should also consider public confidence concerns in applying this categorization.).

The plan should consider additional actions for a line such as:

- Inspect to determine the need to repair or replace.
- Add or enhance the cathodic protection.
- Add or enhance coating protection.
- Actions to minimize the degradation of the inner surface of the piping.
- Add protection against heavy surface loads.

## **B. Activities within the Underground Piping and Tanks Integrity Initiative Scope**

The expectations described in Section 6.2.A above (regarding procedures and oversight, risk ranking, inspection plans, plan implementation, and asset management) are applicable to the components added by the Underground Piping and Tanks Integrity Initiative unless specifically stated otherwise below. The following sections (6.2.6 through 6.2.10) explain the intent of the Underground Piping and Tanks Initiative and provide additional guidance where appropriate. Note that the activities and milestones in sections 6.2.6 through 6.2.10 apply only to the additional components that were added by the Underground Piping and Tank Integrity Initiative when it extended the Buried Piping Integrity Initiative.



## 6.2.6 Procedure and oversight

Procedure and oversight responsibilities applicable to the Underground Piping and Tanks Integrity Initiative, including associated plant programs, shall be revised to include in-scope tanks and piping by December 31, 2011. The following steps are one method of approaching this process.

- Identify the piping and tanks that fall within the scope added by the Underground Piping and Tanks Integrity Initiative.
- Identify the programs or processes in place, or develop new ones if necessary, to manage the leakage and structural integrity of these components.
- Develop or amend existing overarching program or process documents to ensure that all the relevant programs are associated with the Underground Piping and Tanks Integrity Initiative and coordinated to control changes so that Initiative intent is managed and not inadvertently compromised.
- Identify roles and responsibilities for the new program/process
- Develop a process for justifying any deviations to the Initiative elements documented in this guideline. Ensure the process meets the intent of Section A.6.2.1 and this section.

Procedures and oversight shall incorporate the attributes listed in Section 3.3.B.1 plus the “shall” statements in the following paragraphs.

- Process for obtaining review of Initiative and NEI 09-14 interpretations  
Questions regarding the intent of the Initiative or the guidance in this document should be communicated to NEI for review by the Buried Piping Integrity Task Force. The task force will reply to the questioner in a timely manner. The task force will also communicate interpretations of significant generic applicability to the industry as a means of facilitating consistent implementation of the Initiative.

If a utility proceeds with an activity that does not meet the language of the Initiative or a “shall” statement in this document, a justification for deviation shall be processed in accordance with the remainder of this section. Note that a deviation may still meet the intent of the Initiative (see below) even if it does not meet the exact language of the Initiative. For example, it may be possible to risk rank buried piping without addressing every parameter in Section 3.3.A.2.

- Process for justifying and approving exceptions to the Initiative  
When a utility determines that a required element of the Initiative or a “shall” statement in this document will not or cannot be met, a justification for deviation shall be developed and retained with the utility’s corrective action program. If a utility finds itself outside of a required Initiative element and takes immediate action to meet the element, a deviation justification is not required, but the condition should be entered into the corrective action program and the Buried Piping Integrity Task Force should be notified. Required

elements of the Initiative include the entire text of the Initiative (Sections 3.3.A and 3.3.B) and all “shall” statements in this document (summarized in Appendix B).

The justification shall provide the basis for determining that the proposed deviation meets the same objective, or level of conservatism exhibited by the original requirement, and should clearly state how long the deviation will be in effect. Justifications for deviation shall be approved by the responsible utility executive.

To maintain the integrity of the deviation process and ensure a consistent approach to guideline implementation (or inability to implement), it is important for utilities to share deviations with the industry in an open and timely manner. Timely notification of deviations allows the industry to systematically review the issue for potential generic implications and take appropriate actions to facilitate consistent and appropriate implementation of guidance. The following guidance applies:

- Approved deviations shall be sent to NEI in a timely manner for review by the Buried Piping Integrity Task Force (BPITF).
  - The BPITF review is not an independent review or an approval. Their assessment is based on engineering judgment and experience.
- The BPITF will review the justification for deviation for the following items.
  - Effect on guidance.
  - Whether the deviation meets the intent of the Initiative.
  - Generic applicability.
- Generically applicable information relative to the justifications will be communicated to the industry.
- When the BPITF finds that the deviation does not meet the intent of the Initiative, the applicable utility and the Buried Piping Integrity Working Group will be informed. Semi-annually each utility shall report to NEI all active justifications for deviation at each of its plants that are judged to not meet the intent of the Initiative. This report is made as part of the utility’s input to the NSIAC report (Appendix A).
- If the BPITF finds that the deviation does meet the intent of the Initiative, the utility will be informed but the deviation will not be reported to NSIAC. The justification should be retained with utility program documentation.

All requirements described in Section A. 6.2.1 are relevant to this section of the Underground Piping and Tanks Integrity Initiative except for implementation schedules.

### **6.2.7 Prioritization**

The risk ranking process for buried piping will have been established as part of the Buried Piping Integrity Initiative. This process may not be able to incorporate underground piping or tanks because of the different parameters of concern. The process of risk ranking is referred to as “prioritization” within the Underground Piping and Tanks Integrity Initiative in recognition of this situation and the possibility that a risk ranking tool may not be in place when utilities start

the process. Greater use of engineering judgment is expected in the development of prioritization results.

Prioritization shall incorporate the attributes listed in Section 3.3.B.2. Attributes that should also be considered when prioritizing components include:

- Age
- Relevant industry operating experience
- Piping flow rate
- Tank volume
- Contents
- Soil condition and chemistry
- Plant operating history
- Leakage history
- Internal corrosion consideration (such as flow accelerated corrosion for piping only, and microbiologically induced corrosion)
- Coating and lining
- Wet or alternately dry

Prioritization should be adjusted as appropriate to apply engineering judgment to the results.

All requirements described in Section A. 6.2.2 are relevant to the Underground Piping and Tanks Integrity Initiative, except for implementation schedules. Prioritization of components that fall within the scope of the Underground Piping and Tanks Integrity Initiative shall be complete by June 30, 2012.

### **6.2.8 Condition Assessment Plan**

The results of prioritization along with plant and industry experience, plant licensing commitments, and trending of past inspection data should be used to define inspection locations, inspection methods, and inspection schedules. Condition assessment plans shall incorporate the attributes listed in Section 3.3.B.3. The Condition Assessment Plan shall be in place by December 31, 2012. All requirements described in Section A. 6.2.3 are relevant to the Underground Piping and Tanks Integrity Initiative, except for implementation schedules.

### **6.2.9 Plan Implementation**

Implementation of the Condition Assessment plan for components included within the scope added by the Underground Piping and Tanks Integrity Initiative shall start no later than June 30, 2013. The condition assessment of underground piping and tanks containing licensed material shall be completed by June 30, 2014.

After prioritization is performed, the inspection process should address all piping and tanks within the scope of both the initial Buried Piping Integrity Initiative and the Underground Piping and Tanks Integrity Initiative in order to ensure the relative importance of the components are recognized and the more important components are inspected first when possible.

All requirements described in Section A. 6.2.4 are relevant to the Underground Piping and Tanks Integrity Initiative, except for implementation schedules.

#### **6.2.10 Asset Management Plan**

The Asset Management Plan for underground piping and tanks shall be in place by December 31, 2014. All requirements described in Section A. 6.2.5 are relevant to the Underground Piping and Tanks Integrity Initiative, except for implementation schedule.

## 7 REFERENCES

1. EPRI document, *Recommendations for an Effective Program to Control the Degradation of Buried Pipe*, December 2008
2. NACE (National Association of Corrosion Engineers) documents
  - a. SP0502-2008 (formerly RP0502), Pipeline External Corrosion Direct Assessment Methodology
  - b. SP0169-2007 (formerly RP0169), Control of External Corrosion on Underground or Submerged Metallic Piping Systems
  - c. RP0102-2002, In-Line Inspection of Pipelines
  - d. SP0207-2007, Performing Close-Interval Potential Surveys and DC Surface Potential Gradient Surveys on Buried or Submerged Metallic Pipelines
  - e. RP0288, "Standard Recommended Practice: Inspection of Linings on Steel and Concrete Tanks"
3. NEI 07-07, *Industry Ground Water Protection Initiative – Final Guidance Document, August 2007*
4. INPO 98-001, *Equipment Performance and Information Exchange System (EPIX) Reporting Requirements*
5. NUREG 1801, Volume 2 Section X1.M34, Generic Aging Lessons Learned (GALL) Report, Buried Piping and Tanks Inspection
6. ASTM G 158, "Standard Guide for Three Methods of Assessing Buried Steel Tanks"
7. ASTM E 1990, "Standard Guide for Performing Evaluations of Underground Storage Tank Systems for Operational Conformance with 40 CFR, Part 280 Regulations"
8. NLPA Standard 631, "Entry, Cleaning, Interior Inspection, Repair, and Lining of Underground Storage Tanks"



## **APPENDIX A**

### **REPORT TO NSIAC**

#### **REPORT CONTENT**

A report to NSIAC will be prepared semi-annually addressing the following four items:

1. Overview – developed by NEI semi-annually on the following topics as appropriate:
  - Notable information:
    - Incidents that attract media or industry stakeholder attention
    - INPO feedback from plant evaluations
    - Important ANI feedback from plant evaluations
    - Major piping or tank replacements and repairs as determined by NEI Buried Piping Integrity Task Force. Examples are major piping improvement projects where portions of service water systems were replaced with high density polyethylene piping or 6% molybdenum stainless steel)
  - Assessment of availability of technology to support inspections
  - Overall status of Initiative implementation, including the effect of active approved deviations to Initiative elements.
  
2. Progress on Initiative implementation and exceptions – utilities will report to NEI the status of implementation of each Initiative element at each of their plants using the approach described below. The report will be made semiannually (by January 31 and July 31) to NEI. NEI will collect and assemble the information.
  - Report implementation status for each Initiative element and for each plant. The elements and the expected implementation dates are repeated below:
    - Buried piping procedures and oversight in place by 6/30/10
    - Buried piping risk ranking complete by 12/31/10
    - Buried piping inspection plan in place by 6/30/11
    - Underground piping and tanks procedures and oversight in place by 12/31/11
    - Buried piping inspection start by 6/30/12
    - Underground piping and tanks prioritization complete by 6/30/12
    - Underground piping and tanks condition assessment plan in place by 12/31/12
    - Condition assessment of buried piping containing radioactive materials complete by 6/30/13
    - Underground piping and tanks inspection start by 6/30/13
    - Buried piping asset management plan in place by 12/31/13

- Condition assessment of underground piping and tanks containing radioactive materials complete by 6/30/14
  - Underground piping and tanks asset management plan in place by 12/31/14
  - Document the status for each implementation date as follows:
    - Will extend the implementation date or have extended
    - Implementation by the due date is at risk
    - On schedule to meet date
    - Complete
  - Describe each active deviation that does not meet the intent of the Underground Piping and Tanks Integrity Initiative . Note that the existence of an approved deviation to an implementation date does not change the fact that the date will not be met. If an implementation date is not going to be met, it shall be reported as such until the implementation is completed.
3. Industry experience and learning – Utilities will report the information below to INPO. INPO will collect the information and report the results to NEI.
- Utilities will enter operating experience related to the items below into the INPO EPIX database when instances occur. Entries should be made in a timeframe consistent with EPIX timing requirements (Reference 4).
    - Every leak from underground piping and tanks within the scope of this Initiative
    - Significant leaks from underground piping and tanks that are within the scope of this Initiative: Significant leaks are defined as those which meet either of the following criteria
      - Result in concentrations that could exceed the regulatory concentrations or limits established by the NRC or EPA., or
      - Result in voluntary communication under the industry Ground Water Protection Initiative, or
      - Result in the system or component being out of service
    - Adverse inspection findings: defined as indications from inspections that require immediate repair or repair within one cycle
  - Each instance will be categorized into one of the following five areas depending upon the piping segment or tank affected (where more than one area applies, use the one that appears highest in the list below).
    - Safety related
    - Contains licensed material
    - Contains environmentally hazardous fluids (e.g., oils, chemicals, non-radioactive fluids)
    - Components categorized as not “run to failure”
    - Components categorized as “run to failure”
4. Progress on inspection technology development – EPRI will assemble the information below and report the results to NEI.



- Identify each technology that is being researched for possible use in inspections
- Describe the development and implementation status of each identified inspection technology.

### **GENERAL**

Information on leakage from applicable buried/underground piping and tanks using the above criteria will be collected beginning for events that occurred in 2009. Information on Initiative implementation and inspection technology will be collected beginning in 2010.

Information will be collected from utilities, INPO, ANI, and EPRI and sent to NEI semi-annually. NEI will assemble a report for Buried Piping Integrity Task Force review and assessment. The objective is to:

- Prepare an NSIAC presentation.
- Share implementation status and operating experience with the industry as appropriate.



## APPENDIX B

### NEI 09-14 REQUIREMENTS

Section	Requirement
3.3	<p>In order to meet these goals, every utility shall implement measures or program(s) to satisfy the elements and associated key attributes in Sections 3.3.A and B. The language in sections 3.3.A and B below documents the text of the Underground Piping and Tanks Initiative as approved by NSIAC...</p> <p style="text-align: center;"><i><u>Note that the entire text of sections 3.3.A.1 thru 3.3.A.5 and 3.3.B.1 thru 3.3.B.10 is a requirement under the Underground Piping and Tanks Integrity Initiative since these sections constitute the text of the Initiative as approved by NSIAC. In the interest of brevity, the text from these sections is not captured in this table.</u></i></p>
3.5	Every utility shall ensure that activities associated with the Underground Piping and Tanks Integrity Initiative and this document are implemented at its nuclear power plants in accordance with the intent of the Initiative and the implementation dates specified therein.
3.5	If a plant cannot or will not implement any part of the Initiative (Sections 3.3.A and B) or a “shall” statement in this document, a justification for deviation from the Initiative shall be developed and processed in accordance with Section 6.1.
5.1	<p>Utilities shall perform the following actions in support of the Initiative:</p> <ul style="list-style-type: none"> <li>• Implement the actions required by the Initiative (Section 3.3 and all “shall” statements in this document).</li> <li>• Process a justification for deviation (Section 6.1.1) whenever an action required by the Initiative or a “shall” statement in this document cannot be met.</li> <li>• Report all results from inspections performed in accordance with the Initiative in the manner proscribed by the EPRI project manager responsible for the Buried Piping Integrity Group.</li> <li>• Report to NEI the status of meeting the Initiative Implementation dates and any active deviations that do not meet the intent of the Initiative as required for the report to NSIAC (Appendix A)</li> <li>• Report to INPO (EPIX) occurrences of leakage or adverse inspection findings in piping, and tanks within the scope of this Initiative as required for the report to NSIAC (Appendix A)</li> </ul>
6.2.1	The necessary governance and oversight responsibilities shall be in place by June 30, 2010.
6.2.1	The Buried Piping Integrity Program shall be established including the identification of a responsible executive who will carry out the senior level functions specified in the Initiative and this guideline.

Section	Requirement
6.2.1	When a utility determines that a required element of the Initiative cannot be met, a technical justification for deviation shall be developed and retained with the utility's program documentation.
6.2.1	Justifications for deviation shall be reviewed and approved in accordance with the applicable plant procedures with concurrence from the responsible utility executive.
6.2.1	Each utility shall report all approved justifications for deviation that are currently active at each of its plants to NEI semi-annually as part of the utility's input to the NSIAC report.
6.2.1	A Program Plan and associated procedures shall be developed to implement the Underground Piping and Tanks Integrity Initiative.
6.2.1	The program documents and implementing procedures shall implement, as a minimum, the elements of the Underground Piping and Tanks Integrity Initiative (Section 3.3) and requirements in this document.
6.2.2	A risk ranking process shall be used to understand site vulnerabilities and to help prioritize the selection of inspection locations.
6.2.2	<p>The risk ranking process shall incorporate the attributes listed in Section 3.3.A.2 of this document as augmented by the "shall" statement below as a minimum.</p> <ul style="list-style-type: none"> <li>• The risk ranking shall be periodically reviewed and updated as necessary to reflect inspection results, changes in operating conditions, and design modifications.</li> </ul>
6.2.2	The initial risk ranking process shall be complete by December 31, 2010.
6.2.2	The risk ranking process shall determine the likelihood and consequence of failure for each piping segment in order to prioritize inspections or other actions
6.2.3	<p>The inspection plan shall incorporate the attributes listed in Section 3.3.A.3 of this document as augmented by the "shall" statement below.</p> <ul style="list-style-type: none"> <li>• Where buried pipes are protected by a cathodic protection (CP) system, the CP system shall be periodically inspected and tested to assess its continued adequacy.</li> </ul>
6.2.3	The inspection plan shall be in place by June 30, 2011.
6.2.4	Note that segments categorized as "run to failure" are still considered within the scope of the Initiative and leaks and adverse inspection findings in these segments shall be reported in accordance with Appendix A.
6.2.4	All inspection results (whether degradation exists or not) shall be reported to EPRI in the manner proscribed by the Buried Piping Integrity Group project manager.
6.2.4	Implementation of the inspection plan shall start no later than June 30, 2012 and the condition assessment of buried piping containing licensed materials shall be completed by June 30, 2013.
6.2.5	An asset management plan or plans addressing buried piping shall be developed and maintained.
6.2.5	The asset management plan shall be reviewed and approved by an appropriate high level organization within the utility (such as the plant health committee).
6.2.5	The Asset Management Plan for buried piping shall be in place by December 31, 2013.
6.2.6	Procedure and oversight responsibilities applicable to the Underground Piping and Tanks Integrity Initiative, including associated plant programs, shall be revised to

Section	Requirement
	include in-scope tanks and piping by December 31, 2011.
6.2.6	Procedures and oversight shall incorporate the attributes listed in Section 3.3.B.1 plus the “shall” statements in the following paragraphs.
6.2.6	If a utility proceeds with an activity that does not meet the language of the Initiative or a “shall” statement in this document, a justification for deviation shall be processed in accordance with the remainder of this section.
6.2.6	When a utility determines that a required element of the Initiative will not or cannot be met, a justification for deviation shall be developed and retained with the utility’s corrective action program.
6.2.6	The justification shall provide the basis for determining that the proposed deviation meets the same objective, or level of conservatism exhibited by the original requirement, and should clearly state how long the deviation will be in effect.
6.2.6	Justifications for deviation shall be approved by the responsible utility executive.
6.2.6	Approved deviations shall be sent to NEI in a timely manner for review by the Buried Piping Integrity Task Force (BPITF).
6.2.6	Semi-annually each utility shall report to NEI all active justifications for deviation at each of its plants that are judged to not meet the intent of the Initiative.
6.2.7	Prioritization shall incorporate the attributes listed in Section 3.3.B.2.
6.2.7	Prioritization of components that fall within the scope of the Underground Piping and Tanks Integrity Initiative shall be complete by June 30, 2012.
6.2.8	Condition assessment plans shall incorporate the attributes listed in Section 3.3.B.3.
6.2.8	The Condition Assessment Plan shall be in place by December 31, 2012.
6.2.9	Implementation of the Condition Assessment plan for components included within the scope added by the Underground Piping and Tanks Integrity Initiative shall start no later than June 30, 2013.
6.2.9	The condition assessment of underground piping and tanks containing licensed material shall be completed by June 30, 2014.
6.2.10	The Asset Management Plan for underground piping and tanks shall be in place by December 31, 2014.
App A	If an implementation date is not going to be met, it shall be reported as such until the implementation is completed.