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APC 13-11

May 1, 2013

To: Administrative Points of Contact

Subject: Issuance of Revision 3 to NEI 09-14, *Guideline for the Management of Buried Piping Integrity*

Please distribute this letter to managers in your Design and Systems engineering departments, as well as personnel responsible for buried piping programs.

The NSIAC approved the Buried Piping Integrity Initiative in November, 2009 and the Underground Piping and Tanks Integrity Initiative in September, 2010. Since that time, the industry has been challenged by a number of new activities that have significantly increased licensee burden. As part of an effort to concentrate utility resources on safe plant operation and the most safety significant issues, late last year the Buried Piping Integrity Task Force recommended changes to the Underground Piping and Tanks Integrity Initiative that reduce its scope and defer some of its milestones. The NSIAC approved the recommended changes on January 30, 2013. This letter distributes Revision 3 to NEI 09-14 (the document that guides implementation of the Underground Piping and Tanks Integrity Initiative) which reflects the Initiative change. Revision 3 to NEI 09-14 should be incorporated within utility buried piping programs within 6 months of the date of this letter.

NEI 09-14, Revision 3 includes the following changes:

- Revises the Initiative scope and milestones in accordance with the January 2013 Initiative change (Sections 3.1 and 3.3)
- Adds guidance for crediting inspections performed in other programs (Section 6.2.4)
- Moves the description of the Initiative deviation process into its own section (6.3)
- Maintains the content of reports to EPRI and INPO on inspection findings and leaks so that even with the Initiative scope change, all leaks are reported to INPO, and EPRI continues to receive all relevant inspection information (Section 5.1 and Appendix A)
- Adds an expectation for performing periodic self-assessments of Buried Piping or Underground Piping and Tank Integrity Programs and reporting significant problems discovered to NEI or EPRI (Section 5.1)

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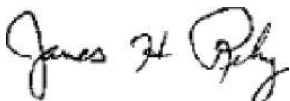
- Makes the June 30, 2013, milestone for starting inspections of underground piping and tanks not applicable to components added by the January, 2013, revision to the Initiative (6.2.9)
- Includes other administrative and editorial changes denoted by side bars in the margin

Although not changed as part of Revision 3, there are two expectations within NEI 09-14 that were discussed at length during the revision process. A summary of these items follows.

- **Communicating Experience:** The deviation process described in Section 6.3.2 includes the following statement (italics added for emphasis): "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.*" The task force is specifically interested in hearing about situations when the discovered condition is significant. Knowledge of significant items and sharing of their generic implications can help everyone make a more accurate assessment of the consistency of Initiative implementation across the industry.
- **Reporting Leaks and Inspection Findings:** It is expected that utilities will continue to report all leakage and adverse inspection findings from buried and underground piping and tanks to INPO through their ICES system, and all inspection findings to EPRI's Buried Piping Integrity Group, even though the affected systems may no longer be within the scope of the Initiative (see Section 5.1 and Appendix A). We have always required that all leaks and inspection findings be reported and this expectation is unchanged in order to maintain the accuracy and completeness of the information we accumulate. The information provides valuable operating experience, aids in inspection planning, and illustrates the effect of the Initiative. If the reports were limited to components and systems that are governed by the Initiative, different classifications of systems and components between utilities would result in different reporting scopes and "fuzzy" data.

We appreciate your support of the Underground Piping and Tanks Integrity Initiative. We expect that our proactive response to this issue will have positive effects on both public confidence and future NRC activities in this area. If you have any questions, please contact me at (202) 739-8137; jhr@nei.org.

Sincerely,



James H. Riley

Attachment

c: Buried Piping Integrity Task Force
Buried Piping Points of Contact