

# **UPTI Initiative Revision and Revision 3 to NEI 09-14**

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**April 25, 2013**



# UPTI Initiative Changes

- **Proposed by the BPITF in response to cumulative effects**
- **Guiding thoughts**
  - **Minimize effect on public confidence goal and regulatory credibility**
  - **Achieve cost savings or deferral**
  - **Maintain planning or inspection start milestones**
- **Supported by inspections completed with no significant findings to date**

# UPTI Changes

- **Scope: Both BPI and UPTI applicable to buried and underground piping and tanks that are**
  - **Below grade and**
  - **Outside of buildings and**
  - **Safety related or**
  - **Contain licensed material or**
  - **Contain environmentally sensitive material**
    - **No intended change from “environmentally hazardous”**

# UPTI Changes

## ■ Milestones

- BPI inspection of piping containing licensed material by **12/31/14** (18 month delay)
- UPTI inspection of piping and tanks containing licensed material by **12/31/14** (6 month delay)
- Buried Piping asset management plan complete by **12/31/14** (12 month delay)

# UPTI Changes

- **NSIAC approved on January 30<sup>th</sup>**
- **Another revision to NEI 09-14 is underway**

# NEI 09-14 Rev 3

- **Revision includes:**
  - **UPTI changes**
  - **Guidance for crediting inspections performed in other programs**
  - **Clarified reporting expectations**
  - **Moved guidance on deviations to its own section**
  - **Editorial changes**

# Definitions

- **Buried and underground**
  - Did not change definitions
  - Programs are established and relationship to GALL is understood
- **Environmentally hazardous**
  - Revised Initiative uses the term “environmentally sensitive” instead of “environmentally hazardous”
  - Difference was inadvertent
  - “Environmentally hazardous” is used

# Scope

- **All buried and 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**
  - Or**
  - **Contain environmentally hazardous material.**



# Milestones

- **3.3.A.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 **December 31, 2014**.
- **3.3.A.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, 2014**.
- **3.3.B.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 **December 31, 2014**.

# Reporting

- Clarified reporting expectations affected by UPTI scope change
  - “Shall” report
    - Results from inspections of piping and tanks within the scope of the Initiative to EPRI (BPIG)
    - All occurrences of leakage to INPO’s Consolidated Event System (ICES)
    - Adverse inspection findings to ICES

# Reporting

## ■ Clarifications (continued)

### — “Should”

- Report relevant information from inspections of all underground or buried piping and tanks to EPRI (BPIG)
- Perform periodic program self assessments
- Contact NEI and EPRI (BPIG) in a timely manner with
  - Instances of significant buried piping program problems,
  - Significant leakage or adverse inspection findings of piping and tanks within the scope of the Initiative

# Initiative Intent

- **6.2.4 Plan Implementation (BPI and UPTI)**
  - **Inspections performed under other site requirements or processes may be used to meet this milestone as long as they meet the intent of Appendix C. This judgment should be documented and retained within the buried piping or underground piping and tanks programs.**

# Initiative Intent

- **6.2.9 Plan Implementation (UPTI)**
  - **January 2013 revision may have added scope**
  - **Starting inspections by June 30, 2013 may not allow adequate time for planning**
  - **Start date does not apply to the components added by the January 2013 change**

# Issue and Implementation

- **Revision 3 will be issued soon**
- **Implementation expected within 6 months of issue**
- **Changes in milestone dates were applicable upon NSIAC approval of the Initiative (January 30, 2013)**