



Buried Pipe and Underground Piping and Tanks

Temporary Instruction

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Agenda

- Objectives
- Content
- Status
- Implementation

Objectives

- Determine whether industry is implementing initiatives in a “committed and enduring fashion....”
- Enable staff to assess whether initiative as implemented provides reasonable assurance of structural and leaktight integrity

Content

- Two phases
 - Each phase has required content
- Inspectors may look beyond required content
 - Guidance provided on potential areas of interest

Content

- Phase 1
 - Concentrates on consistency between initiative and licensee program
 - Are attributes in sections 3.3A and 3.3B of NEI 09-14 in licensee program?
 - Are completion dates in licensee program similar to those recommended in NEI 09-14?
 - Has licensee completed appropriate items?
 - Predominantly yes/no and if not why not answers

Content

- Phase 2
 - Verifies completion dates since Phase 1
 - Concentrates on implementation
 - Series of questions to be answered by inspectors

Content

- Non Mandatory Section
 - May be used in either first or second phase
 - To be selectively used by inspectors

Content

- Nothing in TI is regulatory in nature
 - No enforcement activities contemplated
- Phase 1
 - Deviations found between NEI 09-14 and licensee programs are undesirable
- Phase 2
 - Answers viewed in totality
 - No one answer is good or bad

Status

- TI drafted (Aug 2011)
- Draft placed on NRC Website (Sep 2011)
 - Public comments invited
- Comments received (Oct 2011)
- TI revised (in progress)
- TI issued (Nov 2011)

Implementation

- TI initiated (upon issuance)
 - Inspections begin as soon as December, 2011
- Inspections complete (June 2014)
- TI complete (Dec 2014)