

# Public Meeting with NEI on Operational Leakage Guidelines



**U.S.NRC**  
UNITED STATES NUCLEAR REGULATORY COMMISSION  
*Protecting People and the Environment*

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- Last meeting with NEI on Operational Leakage held on February 15, 2007
- NEI issued Revision 2 to NEI White Paper on May 11, 2007
  - NRC staff in general agreement with paper as it applies to process of making an operability determination for piping with through wall leakage
  - NRC staff not in agreement with aspects of paper concerning acceptance criteria for continued service when flaw is identified outside ASME Section XI ISI
- NRC issued interim guidelines to regional inspectors on June 22, 2007
- NRC transmitted draft revised Appendices C.11 and C.12 on August 14, 2007

## Key Issues of Agreement

- Guidance modified to reflect
  - applicability of Part 9900 operability determination process rather than immediate declaration of inoperability in RIS 2005-20
  - that prompt determination be based on actual NDE measurements
- Agree on applying this guidance to ASME Class 3 moderate energy piping with through wall leakage

## Key Issue for Discussion

- For ASME Class 2 moderate or high energy (HE) components and Class 3 HE components with identified through-wall leakage, the staff considers an immediate operability determination that a reasonable expectation of operability exists to not be feasible based on the comments on the following slide

## Key Issue for Discussion

- Substantial operating experience with pressure boundary leakage and degradation mechanisms in leaking system needed to establish a reasonable expectation of operability
  - this type of information is not generally available
- Detailed NDE data would have to be available to support the determination
  - would take more time to obtain than time allocated for an immediate operability determination



## Other Areas for Discussion

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- Minor changes to C.11 and C.12 since draft issued April 14 – see handout
- NRC staff will develop a set of detailed comments on applicability of Section XI acceptance criteria
- Future Meetings
- Summary