

Purpose of NEI 09-10, "Guidelines for Effective Prevention and Management of System Gas Accumulation"

Ken Petersen
STARS / NEI GAT

1

NEI 09-10 Purpose

- Provides insights and attributes to implement an acceptable approach to effectively prevent and manage gas intrusion and accumulation in plant systems.
- To aid licensees in:
 - Identifying susceptible systems,
 - Outlining principles and practices designed to effectively prevent, identify, manage and monitor accumulation of gas that would challenge the capability of a system to satisfy its design functional requirement(s), and
 - Identifying training to ensure plant personnel can readily recognize and effectively respond to gas intrusion and accumulation in susceptible systems to determine if the degraded system is Operable.

2

TSTF

Technical Specifications Task Force
A Joint Owners Group Activity

Submittal of NEI 09-10 to the NRC

- As stated in the December 21, 2010 transmittal letter of NEI 09-10, Rev. 1:
 - "NRC endorsement of the guidance would be appropriate in order to document our mutual understanding of an acceptable approach to managing gas accumulation in plant systems."
- NRC endorsement of this approach was also requested to proactively address potential questions that may arise during inspection of licensee programs.

3

TSTF

Technical Specifications Task Force
A Joint Owners Group Activity

Regulatory Significance of NEI 09-10

- As stated in the December 21, 2010 transmittal letter of NEI 09-10, Rev. 1,
 - "The industry would like to emphasize that NEI 09-10 was not created as a regulatory requirements document, and, as such is not referenced in the traveler [TSTF-523] nor would such a reference be appropriate."

4

Summary

- NEI 09-10 is:
 - An industry-developed guidance document that may be used by licensees to prevent and manage system gas accumulation; including identifying entrained gas and addressing potential degradation on Operability.

5

Summary

- NEI 09-10 is not:
 - A description of actions required in response to Generic Letter 2008-01
 - A basis for any regulatory requirements
 - A description of actions required to maintain or confirm system operability when degraded conditions are identified
 - A formal industry initiative document
 - A document that affects any licensee's licensing basis

6