

May 6, 2013

Mr. Anthony R. Pietrangelo  
Senior Vice President and  
Chief Nuclear Officer  
Nuclear Energy Institute  
1201 F Street, NW, Suite 1100  
Washington, DC 20004

Dear Mr. Pietrangelo,

Thank you for your letter dated February 8, 2013, providing the industry's updated schedule for completing the Underground Piping and Tanks Integrity Initiative actions. We note that the deadlines for certain requirements have been extended by up to 18 months. We appreciate that the Nuclear Energy Institute's (NEI) Nuclear Strategic Issues Advisory Committee approved the revision as part of an overall reprioritization of industry resources in light of the events at Fukushima and the corresponding regulatory and industry responses.

Since 2009, the U.S. Nuclear Regulatory Commission (NRC) staff members have been interacting with industry to evaluate progress in addressing buried and underground piping and tanks degradation and leakage issues. These interactions generally fall into one of two categories. The first category is informal interactions in the form of NRC public meetings with NEI, the Electric Power Research Institute and the Buried Piping Integrity Group. We find these interactions to be very valuable and appreciate the openness of industry personnel. The second category consists of inspections performed by NRC regional inspectors under Temporary Instruction TI-2515/182 "Review of the Implementation of the Industry Initiative to Control Degradation of Underground Piping and Tanks." Although our inspections have revealed a few items of interest, these inspections have, in general, demonstrated that plants are addressing the issue of degradation of buried and underground piping in a committed fashion.

Although it is too early to draw conclusions about the effectiveness of the industry initiative in reducing the number of leakage events, it is apparent that the initiative has focused the industry's attention on assuring the integrity of these components. The NRC is aware that the initiative has resulted in the conduct of a large number of excavations and direct and indirect inspections which have resulted in the repair or replacement of some degraded material and/or the prevention of leaks. The NRC staff has also observed that increased attention is being paid to cathodic protection systems in preventing corrosion of buried and underground piping and tanks.

Over the long term, the NRC's objective related to buried and underground piping and tanks at operating nuclear power plants under Title 10 of the *Code of Federal Regulations*, Part 50, is to assure continued protection of public health and safety. We believe the revision of the initiative remains consistent with this objective.

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We would like to convey our appreciation to NEI and the industry for its efforts in addressing the issue of buried and underground piping and tanks integrity, and we look forward to continued interaction in this area.

Sincerely,

**/RA/ (Daniel H. Dorman for)**

Eric J. Leeds, Director  
Office of Nuclear Reactor Regulation

cc: J. Riley, Nuclear Energy Institute  
M. Korsnick, Constellation Energy

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Sincerely,

Eric J. Leeds, Director  
Office of Nuclear Reactor Regulation

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M. Korsnick, Constellation Energy

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