



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

June 23, 2015

Mr. Jason Remer  
Nuclear Energy Institute  
1201 F. St, NW  
Suite 1100  
Washington, DC 20004-1218

SUBJECT: LICENSE RENEWAL INTERIM STAFF GUIDANCE, LR-ISG-2015-01,  
"CHANGES TO BURIED AND UNDERGROUND PIPING AND TANK  
RECOMMENDATIONS"

Dear Mr. Remer:

I am writing to inform the Nuclear Energy Institute of the opportunity to comment on the enclosed draft License Renewal Interim Staff Guidance (LR-ISG), LR-ISG-2015-01, "Changes to Buried and Underground Piping and Tanks Recommendations." Enclosed is a copy of the *Federal Register* notice that announces the U.S. Nuclear Regulatory Commission's (NRC's) request for comments and provides instructions on how to submit comments.

Based on recent operating experience and the staff's review of several license renewal applications, the NRC staff has determined that existing guidance in NUREG-1800, Revision 2, "Standard Review Plan for License Renewal Applications for Nuclear Power Plants," (SRP-LR) and NUREG-1801, Revision 2, "Generic Aging Lessons Learned (GALL) Report," should be revised to reflect new recommendations associated with buried and underground piping and tanks within the scope of Title 10 of the *Code of Federal Regulations* Part 54. Examples of the more significant changes include: (a) the number of recommended buried piping inspections; (b) cathodic protection acceptance criteria alternatives; and (c) the recommended sample size increase when certain acceptance criteria are not met. In addition, AMP XI.M41 was rewritten to eliminate duplication of recommendations and reduce the number of tables and footnotes to tables.

To inform other stakeholders of the opportunity to provide comments on the draft LR-ISG-2015-01, courtesy copies of this letter are being sent to subscribers of an NRC electronic mailing list on general license renewal topics.

J. Remer

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If you have any questions, please contact William Holston of my staff by telephone at 301-415-8573 or by e-mail at [William.Holston@nrc.gov](mailto:William.Holston@nrc.gov), or Catherine Nolan of my staff by telephone at 301-415-1535 or by email at [Catherine.Nolan@nrc.gov](mailto:Catherine.Nolan@nrc.gov).

Sincerely,

***/RA/***

Jane E. Marshall, Deputy Director  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Enclosures:  
As stated

cc: Reactor License Renewal Stakeholder  
Group Listserv

J. Remer

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If you have any questions, please contact William Holston of my staff by telephone at 301-415-8573 or by e-mail at [William.Holston@nrc.gov](mailto:William.Holston@nrc.gov), or Catherine Nolan of my staff by telephone at 301-415-1535 or by email at [Catherine.Nolan@nrc.gov](mailto:Catherine.Nolan@nrc.gov).

Sincerely,

**/RA/**

Jane E. Marshall, Deputy Director  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Enclosures:  
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cc: Reactor License Renewal Stakeholder  
Group Listserv

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Letter to J. Remer from J. Marshall dated June 23, 2015

SUBJECT: LICENSE RENEWAL INTERIM STAFF GUIDANCE, LR-ISG-2015-01,  
"CHANGES TO BURIED AND UNDERGROUND PIPING AND TANKS RECOMMENDATIONS"

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