

# PUBLIC SUBMISSION

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Changes to Buried and Underground Piping and Tank Recommendations

**Comment On:** NRC-2015-0159-0001

Changes to Buried and Underground Piping and Tank Recommendations; Draft License Renewal Interim Staff Guidance

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## General Comment

In Appendix B under Section 6 on Page B-9 of draft LR-ISG-2015-01 it states that the qualifications of the individual that is evaluating the coatings for coated piping or tanks. It invokes the NACE Coating Inspector Program Level 2 or 3 inspector qualification. It also allows for an individual who has attended the EPRI Comprehensive Coatings Course and completed the EPRI Buried Pipe Condition Assessment and Repair Training Computer Based Training Course. Invoking the EPRI Comprehensive Coatings Course is overly restrictive and not consistent to what is done within the industry. ASTM D-33 developed ASTM D7108 (Standard Guide for Establishing Qualifications for a Nuclear Coatings Specialist) and this standard is invoked by Regulatory Guide 1.54, Rev. 2. Suggest the sentence be revised to state, or an individual who is a Nuclear Coatings Specialist qualified in accordance with ASTM D7108 and completed the EPRI Buried Pipe Condition Assessment and Repair Training Computer Based Training Course.

SUNSI Review Complete

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