

**TO: Department Licensees**

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**DATE: January 13, 2014**

**SUBJECT: Required Containment Sump Testing When IM is Only Method of LD**

The scenario is this:

A facility switched to SIR's from piping Interstitial Monitoring (IM) with the intention to obviate the need for containment sump testing requirement every three years. This facility does not have an ALLD installed such that IM is satisfying BOTH the monthly "method" AND the "method" required to meet catastrophic requirements (> 3gph at 10psi, < 1 hour; notify or alert the O/O).

Question:

Is containment sump testing still required based on the owner/operator belief that IM is no longer the "primary" form of leak detection ?

Answer:

Yes. They must continue to conduct every 3 year containment sump testing.

Why?

The key in understanding is that both the required monthly method and the catastrophic (3gph within 1 hour requirement) are both referred in administrative rule as a "method". Thus, IM is "primary" for both the monthly and catastrophic required two forms of piping leak detection.

In the scenario described above, the facility later converted to SIR's but IM remained as the primary method for catastrophic leak detection. Thus, containment sump testing every 3 years is required.

Logic would suggest this outcome and administrative rule supports the departments position.