

UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION II 245 PEACHTREE CENTER AVENUE NE, SUITE 1200 ATLANTA, GEORGIA 30303-1257

October 30, 2014

Mr. B. L. Ivey Vice President, Regulatory Affairs Southern Nuclear Operating Company P.O. Box 1295 Bin B022 Birmingham, AL 35201

SUBJECT: VOGTLE ELETRIC GENERATING PLANT UNITS 3 AND 4 – NRC PERIODIC

INSPECTION OF QUALITY ASSURANCE PROGRAM, REPORTS

05200025/2014014 and 05200026/2014014

Dear Mr. Ivey:

On October 10, 2014, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Vogtle Electric Generating Plants Units 3 and 4. The enclosed inspection report documents the inspection results, which the inspectors discussed with Michael Yox, Licensing Manager Vogtle 3&4, and other members of your staff on October 10, 2014.

The inspection examined a sample of construction activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. These activities included programmatic elements to include the Quality Assurance Program as described in your license. Within these areas, the inspection involved examination of selected procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of this inspection, the inspection team concluded that the implementation of the quality assurance program at Vogtle Electric Generating Plants Units 3 and 4 was effective.

No findings were identified during this inspection.

In accordance with 10 Code of Federal Regulations (CFR) 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Website at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Should you have any questions concerning this letter, please contact us.

Sincerely,

/RA/

Michael Ernstes, Branch Chief Construction Projects Branch 4 Division of Construction Projects

Docket Nos.: 5200025, 5200026

Combined Licenses (COL) Nos.: NPF-91, NPF-92

Enclosure: NRC Inspection Report (IR)

05200025/2014014, 05200026/2014014 w/attachment: Supplemental Information

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			via e-mail			
NAME	J. Christensen	G. Crespo	M. Shannon	C. Smith		
DATE	10/28/2014	10/24/2014	10/ /2014	10/28/2014		
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Letter to B. L. Ivey from Michael E. Ernstes dated October 30, 2014

SUBJECT: VOGTLE ELETRIC GENERATING PLANT UNITS 3 AND 4 – NRC PERIODIC

INSPECTION OF QUALITY ASSURANCE PROGRAM, REPORTS

05200025/2014014 and 05200026/2014014

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PUBLIC

U.S. NUCLEAR REGULATORY COMMISSION Region II

Docket Numbers: 5200025

5200026

License Numbers: NPF-91

NPF-92

Report Numbers: 05200025/2014014

05200026/2014014

Licensee: Southern Nuclear Operating Company, Inc.

Facility: Vogtle Electric Generating Plant, Unit 3

Vogtle Electric Generating Plant, Unit 4

Location: Waynesboro, GA

Inspection Dates: October 6, 2014 through October 10, 2014

Inspectors: J. Christensen, Construction Inspector, RII DCI

G. Crespo, Senior Construction Inspector, RII DCI M. Shannon, Senior Construction Inspector, RII DCI

C. Smith, Construction Inspector, RII DCI

Accompanying Personnel: None

Approved by: Michael Ernstes,

Branch Chief

Construction Projects Branch 4
Division of Construction Projects

SUMMARY OF FINDINGS

Inspection Report (IR) 05200025/2014014, 05200026/2014014; 10/06/2014 through 10/10/2014; Vogtle Unit 3 Combined License, Vogtle Unit 4 Combined License, periodic quality assurance inspection report.

This report covers a one week period of inspection, by regional inspectors. The purpose of this inspection was to verify implementation of the quality assurance program with a focus on safety-related construction work in progress.

The Nuclear Regulatory Commission's (NRC's) program for overseeing the construction of commercial nuclear power reactors is described in IMC 2506, "Construction Reactor Oversight Process General Guidance and Basis Document." Inspectors followed the guidance of NRC inspection procedure 35007 – Quality Assurance Program Implementation During Construction and pre-Construction Activities.

A. NRC-Identified and Self Revealed Findings

No findings were identified

B. Licensee-Identified Violations

No findings were identified.

REPORT DETAILS

1. CONSTRUCTION REACTOR SAFETY

Cornerstones: Design/Engineering, Procurement/Fabrication, Construction/Installation, Inspection/Testing

IMC 2504, Inspection of Construction Programs

Quality Assurance Program Implementation During Construction and Pre-Construction Activities (IP 35007)

1P01 Inspection of Construction Quality Assurance Implementation

.1 Appendix 5, Inspection of Criterion V – Instructions, Procedures, and Drawings

a. Inspection Scope

The inspectors performed of document reviews, interviews, and facility walkdowns to determine if:

- Quality Assurance (QA) program documents for preparing and revising implementing instructions, procedures and drawings, for safety related work, comply with the quality assurance program document (QAPD) and updated final safety analysis report (UFSAR) commitments;
- Southern Nuclear Company (SNC), and consortium, has effectively implemented the QA program implementing instructions, procedures and drawings for revising implementing documents; and
- SNC, and consortium, personnel are trained to follow safety related instructions and procedures.

Specifically, the inspectors interviewed responsible personnel to assess their qualification on the installation of class QA1 electrical penetrations, conducted a walkdown of the off-site and the on-site warehouse and storage areas to verify proper use of tracking, identification and segregation procedures, and reviewed the following:

- tracking of training records for staff and re-qualification process maintained by management;
- work packages in several stages of progress from in-process to already completed and closed;
- Equipment Preservation History Cards for the inspection of components received and required maintenance of equipment while in storage;
- a sample of Chicago Bridge and Iron (CB&I) corrective action reports (CARs) associated with SNC condition reports (CRs) to verify that the issues were adequately translated and an adequate solution provided;

- the CB&I procedures governing the creation, control, and management of work packages to verify conformance with the requirements in the UFSAR and 10 Code of Federal Regulations (CFR) Appendix B; and
- eleven safety related work packages to verify that they met the requirements outlined in the CB&I work package procedures.

b. <u>Findings</u>

No findings were identified.

.2 Appendix 6, Inspection of Criterion VI – Document Control

a. <u>Inspection Scope</u>

The inspectors reviewed CB&I and SNC procedures to verify that the procedures were in accordance with American Society of Mechanical Engineers (ASME) NQA-1 and 10 CFR Part 50 Appendix B. The inspectors interviewed personnel in the CB&I document control centers to verify that document control activities were being performed in accordance with CB&I procedures and 10 CFR Part 50 Appendix B. The inspectors also reviewed CARs for compliance with CB&I document control procedures.

b. Findings

No findings were identified.

.3 <u>Appendix 8, Inspection of Criterion VIII - Identification and Control of Materials, Parts and</u> Components

a. <u>Inspection Scope</u>

The inspectors reviewed Westinghouse Electric Corporation (WEC) and CB&I procedures governing material receipt, storage, and control as well as document control to verify compliance with the requirements specified in the UFSAR and 10 CFR Part 50 Appendix B. Additionally, the inspectors toured warehouse locations to verify that they were in accordance with CB&I and WEC storage and handling procedures. The inspectors conducted physical observations of safety-related and/or risk significant items to determine if:

- items were properly identified;
- traceability of the item was consistent and accurate as documented in the computer software that maintains the location, identification and status of stored components;
- items that required inspection or tests were adequately marked; and
- methods used to identify nonconforming items were in agreement with associated documentation.

b. <u>Findings</u>

No findings were identified.

.4 Appendix 10, Inspection of Criterion X – Inspection

a. <u>Inspection Scope</u>

The inspectors reviewed a number of SNC surveillances to determine if they were completed in accordance with 10 CFR Appendix B requirements.

The inspectors reviewed:

- quality assurance inspection reports on work packages for safety related penetration assemblies to verify that the latest of drawings were maintained in the work packages;
- receipt inspection reports for pumps, ASME III items, embeds/anchors, and structural steel to verify that the process was in compliance with procedures indicating unsatisfactory conditions and the requirement for segregation of the materials:
- receipt inspection report packages that included certificates of conformance, material lists, pump and motor parts lists with quantities identified, associated correspondence, Part 21 screening supplemental checklist, and design specifications for Residual Heat Removal safety related pumps; and
- Engineering & Design Coordination Reports (E&DCRs) to assess evaluations performed on conflicting fabrication tolerances.

The inspectors reviewed completed surveillances and quality assurance inspection reports to verify the following were included:

- observation or type of method used to perform inspection;
- item inspected and date of inspection;
- identification of person conducting inspection;
- identification or reference to acceptance criteria;
- results or description of inspection performed; and
- resolution of corrective actions for noted non-conformances or deficiencies.

b. Findings

No findings were identified.

.5 Appendix 13, Inspection of Criterion XIII – Handling, Storage and Shipping

a. Inspection Scope

The inspectors conducted a walkdown of the off-site and on-site warehouse facilities and laydown yards and verified proper storage existed in accordance with licensee documents and requirements. The inspectors verified that required environmental conditions were maintained and items received were properly staged for receipt inspection. Items were marked and tracked through a computer based inventory system. The inspectors sampled a number of items, including Primary Dedicated Safety Panel (PDSP) Console, PDSP Base, Secondary Dedicated Safety Panel Console and assorted

valves and verified the proper storage location as identified by the inventory system. The inspectors reviewed work packages and other documents to ensure proper tracking and identification of materials outside of the storage warehouse. The inspectors examined various elements of the storage of items including the following:

- storage levels for items were properly classified;
- storage location met the requirements of the intended storage level classification including adequate environmental, animal/pest damage or infestation, and security protection;
- caps, plugs, tape and plastic wrappings were used as required to prevent deterioration of items;
- containers, crating and skids were used during storage as necessary;
- containers and items were adequately marked to provide for proper identification;
- nonconforming items discovered during receiving inspection were properly identified, stored and segregated with controlled access;
- the storage area was well drained and paved;
- preventative maintenance activities for equipment in storage were identified and performed;
- the storage area was removed from the actual construction area and traffic to avoid damage from outside sources;
- appropriate cribbing was used;
- the storage area was clean and free of loose debris;
- temperature and humidity logs determined that this area met requirements:
- access to the enclosed storage area was controlled via lock; and
- a log was maintained to ensure that only designated personnel gained entry.

b. Findings

No findings were identified.

.6 Appendix 14, Inspection of Criterion XIV – Inspection, Test, and Operating Status

a. <u>Inspection Scope</u>

The inspectors reviewed several condition reports issued by SNC to ensure compliance with corrective action procedures and that the reports were thorough and contained pertinent information and an adequate final resolution. The inspectors also reviewed the CRs for compliance with SNC document management procedures. The inspectors reviewed four Quality Assurance Surveillances conducted by SNC to verify that they were completed in accordance with 10 CFR Part Appendix B requirements and established SNC procedure ND-QA-003 "Nuclear Development and Consortium Member Quality Assurance Surveillances," Revision 8. The inspectors attended a presentation and discussion by the material management group for implementation of the preventive maintenance processes, which included coordination with different consortium members and work flow using software system "WINPCS". The inspectors reviewed documents to verify that:

- personnel conducting the inspection or test are trained and qualified to perform the inspection or tests;
- items were properly and accurately marked; and

 components found to be in non-conformance were marked and segregated to prevent inadvertent use.

b. <u>Findings</u>

No findings were identified.

.7 <u>Appendix 15, Inspection of Criterion XV –Nonconforming Materials, Parts, or</u> Components

a. <u>Inspection Scope</u>

The inspectors reviewed QS 15.03 R.01.00, "Risk Release of UNSAT/Nonconforming Material/Equipment" to determine the procedural adequacy to ensure that the at-risk release of nonconforming items was completed and controlled in accordance with 10 CFR Appendix B. The inspectors also reviewed a sample of items resolved in accordance with QS 15.03 R.01.00 "Risk Release of UNSAT/Nonconforming Material/Equipment", to ensure the risk release process was being implemented as specified. In addition, the inspectors:

- interviewed responsible personnel and reviewed a sample of nonconformance and disposition reports, issued by CB&I and WEC, to confirm that identified deviations and failures to comply were promptly identified, controlled, evaluated, and dispositioned;
- reviewed a sample of deviation notices to verify the licensee's agents provided effective oversight;
- conducted direct observations of the offsite and onsite materials receiving and storage areas to evaluate the adequacy of controls to segregate, mark, and control nonconforming items to prevent inadvertent installation or use; and
- reviewed a sample of nonconformance and disposition reports to verify compliance with CB&I procedure NCSP-02-08, "Nonconformance Reporting and Control," Revision 0.

b. Findings

No findings were identified.

.8 Appendix 17, Inspection of Criterion XVII – Quality Assurance Records

a. <u>Inspection Scope</u>

The inspectors reviewed procedures for document control and record keeping from SNC, CB&I, and WEC to verify that records were being stored in compliance with 10 CFR Part 50 Appendix B. The inspectors also interviewed CB&I document library staff to verify that the records and work packages were being stored and maintained in accordance with CB&I Procedures. Inspectors visited the satellite record keeping facility known as the Nuclear Island Connex used for document access and control for activities in progress in the field. The inspectors were able to observe the process of checking out work packages and their control while in use by craft personnel.

The inspectors performed an inspection of the Module Assembly Building remote document control facility. Specifically, the inspectors verified that the following requirements from the CB&I Power Standard Nuclear Quality Assurance Program, Section 17, "Quality Assurance Records," were met, such as:

- records were distributed, handled and controlled appropriately;
- the records system was sufficient to permit identification between the record and the activities to which it applies;
- a method existed for tracking release and receipt of records from craft;
- the records were stored in a predetermined location that provided protection from moisture and temperature; and
- methods were established to preclude the entry of unauthorized personnel into the storage area.

b. Findings

No findings were identified.

4. OTHER INSPECTION RESULTS

4A06 Meetings, Including Exit

.1 Exit Meeting.

On October 10, 2014, the inspectors presented the inspection results to Michael Yox, Licensing Manager Vogtle 3&4, along with other licensee and consortium staff members. The inspectors stated that no proprietary information would be included in the inspection report.

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensees and Contractor Personnel

- J. Baines, CB&I Material Manager
- W. Crisler, CB&I Quality Director
- K. Durrwachter, SNC Licensing
- D. Fujiyoshi, CB&I Licensing
- G. Hiler, CB&I Quality Control
- C. Morrow, SNC Licensing
- B. Patterson, CB&I Document Control
- B. Robinson, CB&I Material Manager
- M. Yox, Licensing Manager Vogtle 3&4

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened and Closed

None.

LIST OF DOCUMENTS REVIEWED

Appendix 5

Procedures

- NCSP-02-19-2, "Work Package Planning, Development, Approval and Closure," Rev. 3
- NCSP-02-12, "Construction Quality Completion Program," Rev. 2
- NCSP-02-16, "Construction Documents, Records Managements and Control," Rev. 2
- NCSP-02-07, "Post Acceptance Work Control," Rev. 1
- PRIMI-00062, "Working with Nuclear Quality Assurance Records," Rev. 4

Work Packages

- SV3-1000-CEW-CV0296
- SV3-1210-EGW-EL0355
- SV3-1210-EGW-EL1067
- SV4-1210-EGW-EL0357
- SV4-1210-EGW-EL1068
- SV3-1240-MEW-ME0739
- SV3-2020-MEW-ME0740
- SV3-2020-MEW-ME0848
- SV3-2020-MEW-ME0946
- SV3-WRS-PLW-ME0600
- SV3-WRS-PLW-ME0592
- SV3-CA20-S5W-CV1393
- SV4-1000-CEW-CV1479

Equipment Preservation Check Record

SV3-DAS-JD-001 (DAS Cabinet Charging) Activity – EA50 dated: 5/29/2014

- SV3-DAS-JD-001 (DAS Dunnage) Activity MA605 dated: 5/29/2014
- SV3-DAS-JD-001 (DAS Digital Cabinet Unpacking and Packing) Activity MA614 dated: 5/29/2014
- SV3-DAS-JD-001 (DAS Digital Cabinet Damage) Activity MA615 dated: 5/29/2014

Engineering Document Condition Reports

- APP-ME01-GNR-000130
- APP-ME01-GNR-000071
- APP-ME01-GNR-000103
- APP-ME01-GNR-000013
- APP-ME01-GEF-0146
- APP-ME01-GEF-0071
- APP-ME01-GEF-0103
- APP-ME01-GEF-0013

Non-conformance and Disposition Reports (NC&D)

- SV3-CVS-GNR-000002
- SV4-WLS-GNR-000006
- SV4-WRS-GNR-000023
- SV3-CA01-GNR-000131
- SV3-CR01-GNR-000123
- SV3-KB04-GNR-000001
- SV3-CA01-GNR-000088
- SV3-ME01-GNR-000130

Appendix 6

Reports

- 2014-0528, Potential quality issue with weld testing on CA20-75A (SNC CR# 784236), dated 3/7/2014
- 2013-1705, Dew Point test on shielding gas not performed. NRC IOC 13-64 (SNC CR 708205) dated 9/25/2013

Appendix 8

Procedures

- NPP-10-01, Material Receipt, Storage, and Control, Rev. 3
- APP-GW-GDP-010, AP1000 Consortium Document Control Procedure, Rev. 2
- WEC 6.1, Document Control, Rev. 5
- WEC 13.1, Handling, Storage, Packaging, Cleaning, and Shipping, Rev. 2
- SNC ND-DC-001, Records Management, Rev. 9

Appendix 10

Surveillances

- TE Number 790019 CMP-SURV-Unit 3 CA05-04 Document Review
- TE Number 790272 CMP-SURV-Unit 3 PZR Heater Testing and Packaging
- TE Number 790282 CMP-SURV-Unit 3 AP1000 ACTs Final Data Packages

 TE Number – 794905 CMP-SURV-U3 Aux. Bldg. Area 2 Electric wall penetrations El 66-6 to 82-6 (Column L to I)

Inspection Reports

- IR Number 132175-QA-E204-14-0209 dated: 7/24/2014
- IR Number 132175-QA-E225-001-14-0166 dated: 7/24/2014

Receipt Inspection Reports

- Receipt inspection of WEC Procured-ASME III Items IR Number Q445-014-14-0001 PUMPXX dated: 1/22/2014
- Receipt inspection of WEC Procured-ASME III Items IR Number Q445-014-14-0002 PUMPXX dated: 1/13/2014 with inspection plan
- Receipt inspection of Non-ASME IR Number Q445-011-14-0728 Embeds dated: 09/03/2014
- Receipt inspection of Modules Structural IR Number Q445-004-14-0149 STRSTL dated: 08/21/2014 with inspection plan

Design Specifications

• APP-MP08-Z0-001, Rev. 7

Drawings

- APP-MP08-V1-001, RNS Centrifugal Normal Residual Heat Removal Pump A Outline Drawing, Rev. 0
- APP-MP08-V1-002, RNS Centrifugal Normal Residual Heat Removal Pump B Outline Drawing, Rev. 0
- 30157, Embed Plates Type D2 Special (Cives Steel Company) dated: 03/27/2014 Construction Number SV4-CE01-CE-852223-R0, Rev. 0
- 30101, Embed Plates Type N3 /3'-3" (Cives Steel Company) dated: 03/03/2014 Construction Number SV4-CE01-CE-852009-R0, Rev. 8
- 3104, Plate Type DTN-H/3'-9 (Cives Steel Company) dated: 02/07/2014 Construction Number SV4-CE01-CE-852133-R0, Rev. 0

Engineering & Design Coordination Report

• E&DCR Number APP-SS01-GEF-073, Embedment Plate Fabrication Tolerances, Rev. 0

Appendix 13

Procedures

- NCSP-02-08, "Non-conformances Reporting and Control," Rev. 0
- NPP-10-01, Material Receipt, Storage, and Control, Rev. 3
- APP-GW-GDP-010, AP1000 Consortium Document Control Procedure, Rev. 2
- WEC 6.1, Document Control, Rev. 5
- WEC 13.1, Handling, Storage, Packaging, Cleaning, and Shipping, Rev. 2
- SNC ND-DC-001, Records Management, Rev. 9

Reports

- SV3-KB14-GNR-000001, "KB14 Dimensional discrepancies," Rev. 0
- SV4-ER01-GNR-000001, "MRR 14-04291 Cable Tray," Rev. 0
- SV3-CR01-GNR-000123, "T-head dowel bent incorrectly U3 CVBH," Rev. 0

- SV4-SS01-GNR-000036, "SV4-CH80 copes," Rev. 0
- SV4-CE01-GNR-000023, "MRR14-00900 Embeds," Rev. 0
- SV4-WRS-GNR-000023, "Lack of Fusion," Rev. 0
- SV3-CA01-GNR-000038, "SV3-CA01-37 FLATNESS OUT OF TOLERANCE," Rev. 0
- SV4-WLS-GNR-000006, "Identification marking on spooled Pipe," Rev. 0

Appendix 14

Condition Reports

- 789011, Potential quality issue with weld tests, dated 3/18/2014
- 784236, Potential quality issue with weld testing on CA20-75A, dated 3/07/2014
- 703542, The 50.55(e) evaluation as performed by AMEC on constituent testing by CTL Group is inadequate, dated 9/13/2013
- 708205, NRC IOC 13-64 Dew Point Test on Shielding Gas not Performed, dated 9/25/2013
- 859203, IOC 14-401, U3 RPV weld procedure testing requirements, dated 8/29/2014
- 878463, NRC IOC 14-53 Work Package Signatures Observation, dated 10/10/2014
- 878471, NRC IOC 14-54 Nonconformance Identification Potential Minor violation, dated 10/10/2014

Surveillances

- ND-QA-003, Quality Assurance Surveillances, Rev. 8.0
- TE Number 809570 CMP-SURV-Unit 4 Reactor Closure Head Storage, Completed 7/10/2014
- TE Number 799611 CMP-SURV-Vogtle Unit 4 AP1000 Accumulators (ACTs) A&B Tanks Final Data package Review, Completed 8/8/2014
- TE Number 803962 CMP-SURV-Unit 4 Digital Rod Control System Factory Acceptance Testing (DRCS FAT), Completed 5/19/2014
- TE Number 805141 CMP-SURV-U3 Squib Valves, Completed 6/16/2014

Appendix 15

Procedures

- QS 15.03 R.01.00, "Risk Release of UNSAT/Nonconforming Material/Equipment", Rev. 1
- V-RL-14-0109, "Release of SG Support Columns for Installation", dated 8/25/2014
- SV3-PH01-GNR-000001, "SG Columns Base Plate Dimension", Rev. 0
- V-RL-14-0128, "Embed Plate APP-12161-CE-PW815 for U4", Rev. 0
- SV4-CE01-GNR-000024, "U4 APP-12161-CE-PW815 Plate w Bent DWA", Rev. 0

Reports

- SV3-CA03-GNR-000006, CA03-06 Nelson Studs Bend, Rev. 0
- SV3-CA20-GNR-000455, CA20 Chamfered Holes for OLPs, Rev. 0
- SV3-KB14-GNR-000002, KB14 Pipe Slope, Rev. 0
- SV3-SS01-GNR-000310, Defect in I-Beam Plate, Rev. 0
- SV3-KB04-GNR-000001, KB04 Dimensional Discrepancies, Rev. 0
- SV3-CA01-GNR-000096, CA01-47 Unsat Structural IR Items, Rev. 0
- SV3-CA01-GNR-000090, CA01-18 Bowed Rebar, Rev. 0
- SV2-CA01-GNR-000092, CA01-32 QC Reassessment, Rev. 0

LIST OF ACRONYMS

ADAMS Agencywide Documents Access & Management System

AP1000 Advanced Passive Pressurized Water Reactors
ASME American Society of Mechanical Engineers

CAR Corrective Action Report CB&I Chicago Bridge & Iron

CFR Code of Federal Regulations

CR Condition Report

E&DCR Engineering and Design Coordination Report

NRC Nuclear Regulatory Commission
PARS Publicly Available Records
PDSP Primary Dedicated Safety Panel

QA Quality Assurance

QAPD Quality Assurance Program Description

SNC Southern Nuclear Company

UFSAR Updated Final Safety Analysis Report WEC Westinghouse Electric Corporation