

Part 21 (PAR)

Event # 49234

<b>Rep Org:</b> AMEC ENVIRONMENTAL & INFRASTRUCTURE		<b>Notification Date / Time:</b> 08/03/2013 14:36 (EDT)	
<b>Supplier:</b> CTLGROUP		<b>Event Date / Time:</b> 08/03/2013 (EDT)	
<b>Last Modification:</b> 08/03/2013			
<b>Region:</b> 1	<b>Docket #:</b>		
<b>City:</b> DURHAM	<b>Agreement State:</b> Yes		
<b>County:</b>	<b>License #:</b>		
<b>State:</b> NC			
<b>NRC Notified by:</b> ANDY KOTTENSTETTE		<b>Notifications:</b> MICHAEL F. KING	R2DO
<b>HQ Ops Officer:</b> JOHN SHOEMAKER		PART 21 REACTORS	EMAIL
<b>Emergency Class:</b> NON EMERGENCY			
<b>10 CFR Section:</b>			
21.21(a)(2)	INTERIM EVAL OF DEVIATION		

**INTERIM REPORT REGARDING LABORATORY TEST DATA FOR SAFETY CLASS C CONCRETE AND GROUT**

An interim report was made, as required per 10CFR21.21 (a)(2), of a deviation identified by AMEC Environment & Infrastructure, Inc. The CTLGroup, a supplier of AMEC, did not initially provide all the traceable calibration information required for all the chemicals used in performance of procured tests in regard to laboratory test data of screening tests for constituents related to Safety Class C concrete and grout. An evaluation is underway, but could not be completed within 60 days of discovery. AMEC anticipates that the evaluation will be completed within two weeks of this correspondence, August 17, 2013.

**Affected plants;**  
Vogtle Units 3 & 4 Safety Class C Concrete and Grout and VC Summer Units 2 & 3 Safety Class C Concrete and Grout.

**Name and address of the individual or individuals informing the Commission.**

Donald B. Chandler  
AMEC Environment & Infrastructure, Inc.  
4021 Stirrup Creek Drive, Suite 100  
Durham, NC 27703  
Phone # 919-381-9908

IE19  
MRR



August 3, 2013

U.S Nuclear Regulatory Commission  
Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852

**Subject: Interim Report of the Evaluation of a Deviation Pursuant to 10 CFR  
21.21(a)(2)**

Dear Sir or Madam:

The purpose of this letter is to provide the Commission with the prescribed interim report, as required per 10CFR21.21 (a)(2), of a deviation identified by AMEC Environment & Infrastructure, Inc. The evaluation is underway, but could not be completed within 60 days of discovery. We anticipate that the evaluation will be completed within two weeks of this correspondence, August 17, 2013. The information required for this interim notification is provided below.

*(i) Name and address of the individual or individuals informing the Commission.*

Donald B. Chandler  
AMEC Environment & Infrastructure, Inc.  
4021 Stirrup Creek Drive  
Suite 100  
Durham, NC 27703

*(ii) Identification of the basic component supplied for such facility or such activity within the United States which contains a deviation which is under evaluation.*

Laboratory test data of screening tests for constituents related to Safety Class C concrete and grout and concrete and grout.

*(iii) Identification of the firm supplying the basic component which may contain a potential defect.*

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*(iv) Nature of the Deviation.*

CTLGroup, a supplier of AMEC, did not initially provide all the traceable calibration information required for all the chemicals used in performance of procured tests.

It was subsequently determined by CTLGroup that they:

- do not have, could not obtain, and therefore cannot provide lot identification numbers or retest dates for all the chemicals used in performance of procured tests. Hence the composition of these chemicals is not documented and traceable;
- did not list all the chemicals used, and do not have, could not obtain, and therefore cannot provide Certificates of Analysis (CoA) for all the chemicals used in the performance of tests on submitted bench sheets and QA documents. Hence the composition of these chemicals is not documented and traceable;
- listed incorrect lot numbers of some chemicals used for the procured tests on bench sheets and QA documents; and
- used some calibration standards (chemical standards used in daily calibration of pH meter), that may not be traceable to NIST standards, to perform verification testing of test equipment used in performance of procured tests.

*(v) The date on which the information of such defect or failure to comply was obtained.*

Nonconformance report initiation date: June 4, 2013

*(vi) The case of a basic component which contains the deviation, the number and location of these components in use at, supplied for, being supplied for, or may be supplied for, one or more facilities or activities subject to the regulations in this part.*

Vogtle Units 3 & 4 Safety Class C Concrete and Grout  
VC Summer Units 2 & 3 Safety Class C Concrete and Grout.

*(vii) The corrective action which has been, or will be taken; the name of the individual or organization responsible for the action; and the length of time that has been or will be taken to complete the action.*

- 1) AMEC, concurrently with CTLGroup, is identifying the chemicals used by CTLGroup for the test procedures performed for the project, to date.
- 2) The available information (labeling/CoA) for the chemicals used is being reviewed to determine if there is appropriate documentation of the purity in each case.
- 3) The documentation for the chemicals used is being evaluated for adequacy (traceability of purity and expiration date/information) and compared with the requirements of the test procedure, to determine, if the chemical purity met procedural requirements and was used prior to the expired date/information for the chemical.

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- 4) Where the documentation available indicates possible non-conformance with the test procedure requirements, or if no documentation is available, CTLGroup is performing conformity testing where possible to document whether the chemical used is/was of sufficient purity to provide acceptable results, e.g., results consistent with testing performed using chemicals that have verification documentation attesting that they meet the requirements of the test procedure. Alternately, if it can be determined that the use of the chemical in the test procedure was not quantitative, i.e., the purity of the chemical would not have a quantitative impact on the test result, evidence of such determination would be acceptable.
- 5) CTLGroup is preparing a Quality document for each chemical that has been identified as questionable. This document will include the following, as a minimum.
- A. Chemical name and Lot number(s), as applicable;
  - B. Test procedure(s) that the chemical was used for;
  - C. Sample IDs of the AMEC samples for which the chemicals were used in testing;
  - D. Results of additional confirmation testing performed to indicate that the concentration/purity of the chemical(s) provides test results consistent with use of chemical(s) that have documented purity that meets the requirements of the applicable test procedure(s);
  - E. Written justification, which includes an explanation of the purpose of the chemical in the test procedure and the potential for adverse impact on the test results from the use of a chemical that is not documented to meet the purity requirements of the test procedure; and
  - F. The proposed disposition of the previously reported test results provided to AMEC by CTLGroup, for each sample.
- 6) AMEC personnel are reviewing the data and justification prepared by CTLGroup for each chemical and will determine if the confirmation data, justification, and proposed disposition, are, in its opinion, acceptable and provide satisfactory evidence to support the proposed disposition.

*(viii) Any advice related to the deviation that has been, or will be given to purchasers or licensees/customers.*

None

Please contact Mr. Donald B. Chandler at 919-381-9908 if you have any questions.

Sincerely,

AMEC Environment & Infrastructure, Inc.

  
Donald B. Chandler  
Director of Nuclear Programs