

## Severity Level I Examples

A. ~~Multiple~~ A violations involving ~~safety significant~~ multiple structures, ~~or~~ systems, or components that are completed in a manner such that they would not have satisfied their intended safety related purpose ~~absent corrective actions~~.

B. Inaccurate or incomplete information associated with an ITAAC Notification letter submitted in accordance with 10 CFR 52.99 that is (a) incomplete or inaccurate because of falsification by or with the knowledge of senior plant management, or (b) information that, had it been accurate and complete, would have resulted in the NRC rejecting closure of a ~~safety significant~~ ITAAC and considering an order halting a significant portion of construction activities.

## Severity Level II Examples

A. A ~~widespread and~~ significant breakdown in the Quality assurance (QA) program as exemplified by multiple deficiencies in construction QA related to more than one work activity (e.g., structural, piping, electrical, foundations). These deficiencies normally involve the licensee's failure to provide adequate oversight or take prompt corrective action on the basis of audits and normally involve multiple examples of deficient construction or construction of unknown quality due to inadequate program implementation.

B. A ~~safety related~~ structure ~~or component~~ system, or component that is completed in such a manner that it could have an adverse impact on the safety of operations ~~absent corrective actions~~.

C. Widespread significant failures of licensee QA quality assurance programs, involving ineffective oversight, failures of multiple barriers in the licensee's programs, and corrective action measures, affecting ~~the integrity of~~ multiple safety related structures ~~or~~ systems, or components.

D. Inaccurate or incomplete information associated with an ITAAC Notification letter submitted in accordance with a 10 CFR 52.99 that is (a) incomplete or inaccurate because of deliberate misconduct on the part of a licensee official or careless disregard for accuracy and completeness on the part of licensee personnel, or (b) information that, had it been accurate and complete, would have resulted in the NRC rejecting closure of that an ~~safety significant~~ ITAAC.

## Severity Level III Examples

A. A ~~breakdown deficiency~~ in a licensee QA program for construction related to a single work activity (e.g., structural, piping, electrical, foundations). This significant deficiency normally involves the licensee's failure to consistently provide adequate oversight or take prompt corrective action on the basis of audits ~~with respect to the work activity involved~~, and normally involves multiple examples of deficient construction or construction of unknown quality due to inadequate program implementation.

B. A failure to confirm the design safety requirements of a ~~safety-related~~ structure ~~or~~ system, ~~or component~~ as a result of inadequate pre-operational test program implementation.

C. Ineffective corrective actions, resulting in multiple examples of recurring significant deficiencies associated with a single construction activity process.

D. Inaccurate or incomplete information associated with an ITAAC Notification letter submitted in accordance with a 10 CFR 52.99 that, had it been accurate and complete, would have resulted in ~~(a) the NRC rejecting closure of an ITAAC with more than minor safety significance, or (b)~~ reconsideration of a regulatory position or substantial further inquiry by the NRC.

E. A failure to make a required 10 CFR 50.55(e) report.

- F. ~~Significant deficiencies in the licensee's quality assurance program related to structural installation and supports, involving failure to ensure compliance with instructions, procedures, and drawings, and failure to conduct adequate oversight of safety related structural activities, resulting in multiple examples of omitted work.~~

## **Severity Level IV Examples**

- A. Failure to meet regulatory requirements including one or more Quality Assurance Criterion that have more than minor safety or environmental significance.
- B. Failure to **establish**, maintain, **and implement** adequate controls over quality related procurement, construction, examination, or testing processes.
- C. Information associated with an ITAAC Notification letter submitted in accordance with 10 CFR 52.99 that was correct at the time of submission but **later** deemed inaccurate due to **(a) damage caused by subsequent inadequately controlled construction activities or (b) subsequently developed new information and (c) the licensee did not make timely and effective notification to the NRC.**
- D. **An isolated example of a failure to adequately implement quality assurance processes or procedures.**
- E. Failure to maintain quality assurance records to demonstrate the adequacy of construction.
- F. Failure to provide adequate guidance in determining the classification of structures, systems, and components due to deficiencies in the licensee's design control process.