



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION II  
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ATLANTA, GEORGIA 30303-1257

September 20, 2017

Michael Yox  
VEGP 3 & 4 Regulatory Affairs Director  
Southern Company  
7825 River Road  
Waynesboro, GA 30830

SUBJECT: VOGTLE UNIT 3 COMBINED LICENSE, VOGTLE UNIT 4 COMBINED  
LICENSE - NRC INTEGRATED INSPECTION REPORTS 05200025/2017007,  
05200026/2017007

Dear Mr. Yox:

On August 8, 2017, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Vogtle Electric Generating Plant (VEGP) Units 3 and 4. The enclosed inspection report documents the inspection results, which the inspectors discussed on August 8, 2017 with Mr. Hundley, Southern Nuclear Operating Company, Inc. (SNC) Performance Improvement & Corrective Action Program Manager, along with other members of your staff.

The inspection examined a sample of construction activities conducted under your Combined License (COL) as it relates to safety and compliance with the Commission's rules and regulations and with the conditions of these documents. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

Based on the inspection sample, the inspection team concluded that the implementation of the Correction Action Program (CAP) and overall performance related to identifying, evaluating, and resolving problems at Vogtle Electric Generating Plant Units 3 and 4 was adequate. Licensee and contractor identified problems were entered into the CAP at an appropriate threshold. Problems were prioritized and evaluated commensurate with the safety significance of the problems. Corrective actions were effectively implemented in a timely manner commensurate with their importance to safety and addressed the identified causes of problems. Lessons learned from industry construction experience were effectively reviewed and applied when appropriate. Audits and self-assessments were generally used to identify problems and appropriate actions. Based on the assessment of safety culture results, interviews conducted during the inspection, and a review of the employee concerns program, employee freedom to raise nuclear safety concerns without fear of reprisal appeared to be demonstrated.

This report documents one licensee-identified violation (LIV), which was determined to be of very low safety significance. Because of the very low safety significance and because it is entered into your corrective action program, the NRC is treating this finding as non-cited violation consistent with Section 2.3. of the NRC's Enforcement Policy.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any), will be made 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 Web site 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/**

Jamie Heisserer, Chief  
Construction Inspection Branch 1  
Division of Construction Oversight

Docket Nos.: 5200025, 5200026

License Nos: NPF-91, NPF-92

Enclosure: NRC Inspection Report (IR) 05200025/2017007, 05200026/2017007  
w/attachment: Supplemental Information

SUBJECT: VOGTLE UNIT 3 COMBINED LICENSE, VOGTLE UNIT 4 COMBINED LICENSE - NRC INTEGRATED INSPECTION REPORTS 05200025/2017007, 05200026/2017007

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**U.S. NUCLEAR REGULATORY COMMISSION  
Region II**

Docket Numbers: 5200025  
5200026

License Numbers: NPF-91  
NPF-92

Report Numbers: 05200025/2017007  
05200026/2017007

Licensee: Southern Nuclear Operating Company, Inc.  
Southern Nuclear Operating Company, Inc.

Facility: Vogtle Unit 3 Combined License  
Vogtle Unit 4 Combined License

Location: Waynesboro, GA  
Inspection Dates: July 10, 2017 through August 8, 2017

Inspectors: N. Covert, Senior Construction Inspector, DCO  
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Approved by: Jamie Heisserer, Chief  
Construction Inspection Branch 1  
Division of Construction Oversight

Enclosure

## **SUMMARY OF FINDINGS**

Inspection Report (IR) 05200025/2017007, 05200026/2017007; 07/10/2017 through 08/08/2017; Vogtle Unit 3 Combined License, Vogtle Unit 4 Combined License, routine integrated inspection report.

This report covers a three week long inspection by regional inspectors of the Corrective Action Program (CAP). The significance of most findings is indicated by their color (Green, White, Yellow, or Red) using IMC 2519, "Construction Significance Determination Process," dated July 15, 2013. Construction Cross Cutting Aspects are determined using IMC 0613, "Power Reactor Construction Inspection Reports," dated February 9, 2017. The 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," dated February 20, 2017 and IMC 2504, "Construction Inspection Program: Inspection of Construction and Operational Programs," dated October 24, 2012. The CAP inspection was performed in accordance with inspection procedure (IP) 35007, "Quality Assurance Program Implementation during Construction and Pre-Construction Activities," dated December 8, 2016.

### **Problem Identification and Resolution**

Based on the inspection sample, the inspection team concluded that the implementation of the CAP and overall performance related to identifying, evaluating, and resolving problems at Vogtle Electric Generating Plant Units 3 and 4 was adequate. Licensee and contractor identified problems were entered into the CAP at an appropriate threshold. Problems were prioritized and evaluated commensurate with the safety significance of the problems. Corrective actions were effectively implemented in a timely manner commensurate with their importance to safety and addressed the identified causes of problems. Lessons learned from industry construction experience were effectively reviewed and applied when appropriate. Audits and self-assessments were generally used to identify problems and appropriate actions. Based on the assessment of safety culture results, interviews conducted during the inspection, and a review of the employee concerns program, employee freedom to raise nuclear safety concerns without fear of reprisal appeared to be demonstrated.

#### **A. NRC-Identified and Self Revealed Findings**

No findings were identified.

#### **B. Licensee-Identified Violations**

A violation of very low safety significance that was identified by the licensee has been reviewed by the NRC. Corrective actions taken by the licensee have been entered into the licensee's CAP. This violation and corrective action tracking numbers are listed in Section 4OA7 of this report.



## REPORT DETAILS

### Summary of Plant Construction Status

#### 1. CONSTRUCTION REACTOR SAFETY

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

#### IMC 2504, Construction Inspection Program – Inspection of Construction and Operational Programs

##### 1P01 Construction Quality Assurance (QA) Criterion 16 - CAP - Assessment of the Corrective Action Program Effectiveness

###### a. Inspection Scope

The inspectors reviewed the licensee's CAP to determine if the licensee was effectively implementing their approved quality assurance plan as required by 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants." The licensee delegated responsibility for implementing elements of the CAP to its engineering, procurement, and construction (EPC) contractor. The delegation was permitted by the licensee's quality assurance plan; however, the plan also stated that the licensee maintained responsibility for the effectiveness of corrective action measures. Consequently, the inspection scope included a review of programs established by both the licensee and its contractors.

The inspectors reviewed implementing procedures and documents for the identification, evaluation, and resolution of conditions adverse to quality (CAQs). The review was performed to determine whether the procedures and documents established by the licensee and their engineering, procurement, and construction (EPC) contractor followed the licensee's quality assurance program description (QAPD) requirements, NQA-1, Updated Final Safety Analysis Report (UFSAR), and other license commitments.

The inspectors reviewed CAP procedure revisions to verify that the changes made did not reduce commitments, license requirements, etc. and to verify that the procedure changes did not negatively impact CAQs, Condition Reports (CRs,) reportable items, etc. Specifically the inspectors reviewed:

- ND-AD-002, "Nuclear Development Corrective Action Program," Revs. 24 to 26
- ND-AD-VNP-001, "Interface of Corrective Action Process," Revs 5 to 6
- ND-LI-001, "10 CFR Part 21 and 10 CFR 50.55(e)," Revs. 12 to 13

The inspectors reviewed the thresholds established for problem identification, the effectiveness of immediate and preventive corrective actions, the accuracy and thoroughness of problem documentation, and the adequacy of corrective actions for previously identified compliance issues.

The review scope included an evaluation whether the following CAP performance attributes were addressed:

- classification, prioritization, and evaluation for reportability of CAQs
- complete and accurate identification of problems in a timely manner commensurate with their significance and ease of discovery
- screening of items entered into the CAP as necessary to determine the proper level of evaluation
- identification and correction of procurement program deviations and deficiencies;
- identification and correction of design deficiencies or errors
- considerations for extent of conditions, generic implications, common causes, and previous occurrences as appropriate
- classification and prioritization of the resolution of problems commensurate with safety significance
- for significant conditions adverse to quality (SCAQs), identification of root and contributing causes, as well as actions to preclude recurrence
- identification of corrective actions that were appropriately focused to correct the problem
- completion of corrective actions in a timely manner commensurate with the safety significance of the issue (including the use of interim corrective actions and/or compensatory actions to minimize the problem and/or mitigate its effects until permanent actions can be implemented)
- provisions for escalating to higher management those corrective actions that are not adequate or not timely
- overview of trends in CAQs
- coverage to include important non-safety related structures, systems, and components (SSCs)
- evaluation of operating experience (OE) information

The inspectors reviewed a sample of issues processed or identified since the last CAP inspection in July 2016 to evaluate whether the CAPs were implemented in accordance with program procedures. The selection of issues included a diverse sample across the two CAPs used by the licensee and the EPC contractor. The inspectors sampled issues related to CAQs, issues categorized as SCAQs, and items that had been determined to not represent CAQs to determine whether:

- conditions adverse to quality were promptly identified and corrected;
- classification and prioritization of the resolution of each problem was commensurate with its safety significance;
- conditions were screened upon entry into the CAP to determine the proper level of evaluation;
- the items entered into the CAP included the identification and correction of issues throughout all aspects of the project scope;
- for SCAQs, the cause was determined, corrective actions were taken to prevent recurrence, and the cause and corrective actions taken were documented and reported to appropriate levels of management;
- proper consideration of extent of conditions, generic implications, common causes, and previous occurrences was performed;

- the corrective actions developed were appropriately focused to ensure the problems were corrected;
- the licensee and their contractors properly evaluated and reported conditions in accordance with 10 CFR 50.55(e) and 10 CFR 21;
- the identification and correction of design deficiencies were being adequately addressed;
- extent of conditions were adequately addressed and appropriate corrective actions were developed and implemented; and
- the evaluations properly considered the escalation of issues to higher management if the corrective actions were not adequate or timely.

The inspectors reviewed the procedures and a sample of issues from the licensee and contractor's observation, trending, and metrics programs to determine if the licensee was identifying CAQs and transferring those issues to the respective CAP program. The inspectors reviewed a sample of recent trend reports and metrics to determine whether:

- the trend reports were issued within the time frames established by procedures;
- the content of the trend reports and metrics contained information and analysis of licensee and EPC contractor performance improvement activities; and
- CAP inputs were generated for adverse trends or recommendations as required by program procedures.

The inspection scope included an evaluation of the handling of issues introduced into the CAPs from sources including self-assessments and audits, NRC generic communications, and operating and construction experience (ConE).

The processing of identified issues was evaluated to determine whether personnel were identifying issues at the proper threshold, entering the issues into the CAP in a timely manner, and assigning the appropriate prioritization for resolution of the issues. The inspectors also determined whether personnel assigned the appropriate investigation method to ensure the proper determination of root, apparent, and/or contributing causes. The inspectors evaluated the timeliness and effectiveness of corrective actions, and actions to prevent recurrence where required by 10 CFR Part 50, Appendix B.

The inspectors evaluated the CAP screening for potentially significant and reportable conditions to determine whether reviewers adequately considered risk, safety significance, consequence of malfunctions or failures, complexity of design and fabrication, needs for special controls or surveillance over activities, the degree to which functional compliance could be demonstrated by inspection or test, the quality history and degree of standardization of items, and the difficulty of repair or replacement. In addition, the inspectors reviewed previously identified 10 CFR 50.55(e) notifications sent by the licensee to the NRC to determine whether the licensee and their contractor adequately described the issue, met the timeliness for evaluation and reportability, and performed adequate corrective actions.

The inspectors reviewed a sample of Nonconformance and Disposition reports (N&Ds) to determine whether:

- the reports correctly and clearly identified the nonconformances;
- the N&Ds were adequately initiated, processed, reviewed, dispositioned, and closed in accordance with the quality assurance program implementing documents for the control of nonconforming material, parts, and components;
- N&Ds were appropriately screened for non-hardware related CAQs;
- reportability screening and evaluations under 10 CFR Part 21 and 10 CFR 50.55(e) were performed;
- applicability to project documents, records, and inspections, tests, analysis, and acceptance criteria (ITAAC) was properly identified and documented;
- the dispositions were properly identified and documented;
- adequate technical justification for the acceptability of a nonconforming item, dispositioned repair, or use-as-is was appropriately documented;
- nonconformances dispositioned use-as-is or repair were subjected to design control measures commensurate with those applied to the original design; and
- repaired or reworked items were re-examined in accordance with applicable procedures and with the original acceptance criteria unless the disposition had established alternate acceptance criteria.

As part of the N&D review, inspectors also reviewed the contractor significance evaluation screening and N&D trend analysis/reporting programs.

In addition, inspectors reviewed applicable Engineering and Design Coordination Reports (E&DCRs) to determine if:

- the licensee was identifying design issues at an appropriate threshold;
- design activities were completed in accordance with the approved procedures;
- design inputs were correctly identified and documented, and were reviewed and approved by the responsible engineering group;
- deviations from requirements were effectively dispositioned; and
- documents were consistent with the design commitments and requirements of the technical specifications, the UFSAR, and code commitments.

Last, the inspectors reviewed the CAP processing and handling of regulatory treatment of non-safety systems (RTNSS). The inspectors reviewed a sampling of condition reports (CRs) and corrective action prevention and learnings (CAPALs) for RTNSS components to verify that requirements in the QAPD, UFSAR, and other licensing documents were correctly flowed down into the corrective action program and implemented at the site level.

#### b. Assessment

##### Assessment – Effectiveness of Problem Identification

The inspectors determined that CAQs were being identified on a timely basis and the decision threshold for entering issues into the CAP was conservative. Where identified issues and corrective actions involved multiple organizations, procedures, and processes, and screening meetings had been implemented to ensure shared

issues were entered into the respective CAPs. Trending of CAP entries and activities was periodically performed to identify areas for management attention.

The inspectors did identify that the EPC contractor did not have specific procedural guidance for processing RTNSS issues within the corrective action program. Specifically, the applicable procedure, W2-5.1-102, "Westinghouse Issue Review Committee, Rev. 3.0," did not contain specific decision criteria for identifying and categorizing RTNSS significance.

The inspectors noted that the effective performance of EPC contractor reviewers for RTNSS issues was highly dependent upon the personal insights of individual reviewers. The inspectors also observed that both the licensee and the EPC contractor were challenged when asked to search and retrieve RTNSS issues in their associated CAP. However, the inspectors did not identify any RTNSS issues that were not adequately dispositioned and corrected in the CAP. This issue was documented in CAPAL 100482542 and CR 10389687.

#### Assessment – Effectiveness of Prioritization and Evaluation of Issues

The inspectors determined that the prioritization and evaluation of adverse conditions were conducted in accordance with licensee and EPC contractor procedures. The inspectors noted that under the licensee's oversight, the EPC contractor downgraded CAQs to non-CAQs and screened CAPALs at a lower significance level, as a result of a change in the CAQ definition in W2-5.1-102, "Issue Review Committee," revision 2.1. This issue is discussed in more detail in section A4O7 and the licensee and contractor were performing an extent of condition review at the time of the NRC inspection. The inspectors did not identify any additional CAQs that had not been screened correctly or any immediate safety issues that were not promptly addressed. Based on the samples selected for inspection, significance determinations performed by the licensee and EPC contractor were properly conceived and were sufficiently thorough to determine the causes that would require actions to prevent or mitigate recurrence.

#### Assessment – Effectiveness of Corrective Actions

The inspectors determined in most cases, corrective actions for identified deficiencies were timely, adequately implemented, and commensurate with their safety significance. Corrective actions associated with SCAQs included provisions for preventing recurrence. Problems identified through root and apparent cause methodologies were resolved in accordance with applicable program and NRC requirements.

#### c. Findings

No findings were identified.

## 1P02 Construction QA Criterion 16 - CAP - Assessment Use of Construction Experience

### a. Inspection Scope

The inspectors reviewed the licensee and EPC contractor's ConE programs to determine if:

- relevant internal and external construction and operating experience items were collected;
- collected experience items were adequately evaluated;
- relevant experience items were communicated to affected stakeholders; and
- experience items were used to inform plant design and work processes.

The inspectors reviewed CAP procedures revisions to verify that the changes made did not reduce commitments, license requirements, etc. and to verify that the procedure changes did not negatively impact CAQs, CRs, reportability items, etc. Specifically the inspectors reviewed the following CAP implementing procedures used to evaluate ConE and OE:

- ND-AD-VNP-004, "Construction Experience," Revs. 10 to 11
- NMP-GM-008, "Operating Experience Program," Revs. 17 to 17.1 to 17.2 to 17.3

The inspectors interviewed the licensee and EPC contractor's principal managers of construction and operating experience to gain a better understanding of their handling of relevant internal and external experiences. The inspectors reviewed the licensee's ConE database and CAP to determine whether items that were classified as applicable were stored in the ConE database and entered into the CAP as specified by procedure. The inspectors reviewed the licensee ConE database to determine whether the licensee appropriately added NRC related information, such as 10 CFR Part 21 notifications and Generic Letters. The inspectors reviewed a sample of CAP documents to determine if the licensee was entering applicable industry experience items into the CAP and dispositioning the items appropriately.

### b. Assessment

The inspectors determined that the licensee and EPC contractor adequately identified construction and operating experience and adequately screened and evaluated these experiences for applicability to the project. The inspectors noted that the licensee and EPC contractor routinely entered this information in the CAP for evaluation and tracking. The inspectors reviewed a sample of CRs and CAPALs that were initiated in order to capture and evaluate relevant external and internal ConE. The inspectors determined that the licensee and EPC contractor had established adequate measures to identify and evaluate construction and operating experience and had properly communicated relevant operating and experience commensurate with the safety significance of the issue.

### c. Findings

No findings were identified.

1P03 Construction QA Criterion 16 - CAP - Assessment of Self-Assessments and Audits

a. Inspection Scope

The inspectors reviewed the program and procedures used by the licensee and its EPC contractor to conduct self-assessments, audits, observations, and surveillance reports. The inspectors reviewed a sample of documented self-assessments, audits, and effectiveness reviews. The review was performed to determine whether the oversight of the CAP by the licensee and EPC contractor was sufficient to verify the health of the program and to identify areas for improvement as needed. The inspectors also compared the results of the audits and self-assessments to the results of the inspection to determine if there were any discrepancies between the results of the inspection and the licensee's conclusions.

b. Assessment

The inspectors determined that the conduct of audits, self-assessments, and effectiveness reviews by the licensee and EPC contractor were accomplished in accordance with established procedures. The implementation of the oversight and independent verifications provided assessments of program effectiveness, including the interfaces of CAPs across organizational boundaries. Corrective actions to address the identified issues were generally prioritized, evaluated, and completed within applicable procedural requirements.

c. Findings

No findings were identified.

1P04 Construction QA Criterion 16 - CAP - Assessment of Safety Conscious Work Environment

a. Inspection Scope

The inspectors conducted a review to provide insight into whether a safety conscious work environment (SCWE) was being maintained and to confirm that Vogtle Electric Generating Plant and its contractors were complying with NRC requirements. The review also assessed Vogtle and the EPC contractor Employee Concern Programs' (ECP) effectiveness, and evaluated management oversight of the corrective action process including anonymous CAP entries. These reviews were used to help determine if licensee and contractor personnel were willing to report safety issues via the different avenues available (CAP, ECP, management, etc.).

The inspectors interviewed construction staff and observed other activities involving licensee personnel during the inspection to identify areas and issues that may represent challenges to the free flow of information, such as areas where employees may be reluctant to raise concerns or report issues in the CAP. The inspectors interviewed ECP personnel and other staff who were the designated SCWE subject matter experts. Interviews with SCWE subject matter experts were conducted to:

- determine if the staff was knowledgeable of SCWE processes and procedures;
- understand the interrelationship between the licensee and contractor ECPs; and
- understand any current perceived challenges as they related to SCWE.

Licensee and contractor ECP audits and self-assessments were reviewed to determine if identified issues were addressed and actions to prevent recurrence were put in place. Licensee and contractor ECP procedures and files were reviewed to determine if:

- procedures were adequate;
- files contained adequate documentation;
- issues were entered and reviewed in a timely manner;
- concerns were adequately addressed;
- corrective actions were tracked; and
- individuals were provided feedback.

The inspectors evaluated SCWE training material to determine if it provided:

- clear, concise, and complete information regarding how to report concerns;
- contact information for reporting concerns;
- roles and responsibilities;
- importance of reporting safety concerns and its impact; and
- a means to determine training effectiveness.

The inspectors evaluated a sample of anonymous concerns entered into the CAP and the methods used to resolve safety significant issues where the methods represented alternatives to the CAP (e.g. ECP). The inspectors reviewed both licensee and contractor anonymous CAP entries, CAP entries by ECP or about ECP, and CAP entries pertaining to SCWE issues to determine if:

- these were entered into the CAP in a timely manner consistent with the safety significance of the issue;
- recurring issues were adequately evaluated and trended; and
- the identified issues were adequately resolved.

These CAP entries were also reviewed to determine if area trends raised via different avenues (e.g. management, ECP and CAP programs) were promptly identified and addressed, and to determine if the various programs were identifying the cross-cutting and underlying causes. The inspectors also reviewed repeat issue identification in anonymous CAP entries to determine if these had been the result of inadequate corrective action which could cause personnel to be reluctant to identify additional related issues.

The inspectors reviewed corrective actions associated with the Nuclear Safety Culture (NSC) Recovery Plan and NSC Improvement Plan for 2017. The team utilized attributes of IP 35007, "Quality Assurance Program Implementation during Construction and Pre-Construction Activities," dated December 8, 2016, and IP 40100, "Independent Safety Culture Assessment Followup," dated April 9, 2015, to perform these reviews. The inspectors also reviewed SCWE assessments and audits, along with NSC/SCWE metrics.



Additionally, interviews were conducted to determine if personnel knew how to raise safety concerns, if they felt free to raise such concerns, and if they were aware of alternate means for reporting safety concerns. The inspectors conducted approximately 50 interviews with randomly selected construction employees from Southern Nuclear Company (SNC), Westinghouse (WEC), and Fluor, from Vogtle Unit 3 and 4. The interviewees included craft foreman, craft, and individual contributors and included individuals from Construction Engineering, Field Engineering, Fitness for Duty, and the Operational Readiness Organization.

b. Assessment

The inspectors concluded that the foundation for a healthy safety conscious work environment existed at the site. The ECP for both the Licensee and its contractor were effective in evaluating concerns. Anonymous CAP entries were properly investigated and dispositioned. Increased leadership emphasis, from both the Licensee and their contractor, were in place to enhance the nuclear safety culture at the site. Based on the sample of people interviewed, the individuals generally responded that they acknowledged receiving training on SCWE and how to raise nuclear safety concerns; were aware of the various avenues available to raise nuclear safety concerns; were willing to raise nuclear safety concerns without fear of retaliation; and felt management supported their ability to raise concerns.

c. Findings

No findings were identified.

#### 4. **OTHER INSPECTION RESULTS**

40A6 Meetings, Including Exit

On August 8, 2017, the inspectors presented the inspection results to Mr. Hundley, SNC Performance Improvement & Corrective Action Program Manager, along with other licensee and contractor staff members. The inspectors stated that no proprietary information would be included in the inspection report.

40A7 Licensee-Identified Violations.

On January 18, 2017, the EPC contractor revised the definition of condition adverse to quality in W2-5.1-102, "Issue Review Committee," revision 2.1. As a result of the revision, issues that were previously classified as CAQs were downgraded to non-CAQs and CAPALs were screened at a lower significance level. As part of this inspection, the inspectors reviewed the change in definition and the actions the EPC contractor and licensee had taken to date.

The following licensee-identified violation of NRC requirements was determined to be of very low significance (Green) and meets the NRC Enforcement Policy criteria for

being dispositioned as a Non-cited Violation. Corrective actions taken by the licensee have been entered into the licensee's CAP.

The inspectors noted that under the licensee's oversight, the EPC contractor downgraded CAQs to non-CAQs and screened CAPALs at a lower significance level, as a result of a change in the CAQ definition in W2-5.1-102, "Issue Review Committee," revision 2.1. From the change, at least 800 CAPALs were being reviewed for potential impact as part of an extent of condition.

The inspectors determined that the implementation of the revised CAQ definition in W2-5.1-102, Revision 2.1, Appendix A guidance was a performance deficiency. The revised CAQ definition was "an all-inclusive term used in reference to any of the following degraded conditions: failures, malfunctions, deficiencies, defective items and nonconformance that have affected, or have the potential to affect the capability of a structure, system or component to satisfactorily perform a safety-related function."

Criterion XVI, Corrective Action, in 10 CFR 50 Appendix B, states in part that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. Contrary to above, on January 18, 2017, the EPC contractor, under the licensee's oversight, implemented a new CAQ definition and as a result of the implementation, the measures established did not assure that all CAQs, not just safety-related issues were promptly identified and corrected. On March 1, 2017, the CAQ definition was changed back to the NQA-1 version in procedure W2-5.1-102, Revision 3.

This issue was considered more than minor because the performance deficiency represents a substantive failure to establish or implement an adequate program, process, procedure, or quality oversight function. In addition, the team determined that the performance deficiency also represents an adverse condition that rendered the quality of an SSC, unacceptable or indeterminate, and requires substantive corrective action. Using IMC 2519, Appendix A, "AP1000 Construction Significance Determination Process," the inspectors determined that this finding was of very low safety significance (Green) because the finding was involved with the requirements of an operational or construction program listed in IMC 2504; it was associated with the failure to properly implement a program requirement; and the finding is not associated with a system or structure. There are no cross-cutting aspects assigned to licensee identified violations.

The licensee and EPC contractors documented this issue in the corrective action program as CAPALs 100443330, 100443586, 100450198, 100454571, 100470672, 100471783, 100477148 and CRs 10319896 and 10373352. The inspectors reviewed the corrective actions associated with this LIV, which included the timeline associated with the LIV and the extent of condition, which was in progress at the time of the inspection. This issue is closed because the finding is not associated with an ITAAC acceptance criteria. LIV 05200025/2017007-01 and 05200026/2016007-01, "Inadequate Implementation of CAQ Definition."

## SUPPLEMENTAL INFORMATION

### KEY POINTS OF CONTACT

#### Licensees and Contractor Personnel

R. Berube, SNC CE/OE Coordinator, Vogtle 3&4  
A. Buckley, WECTEC Licensing Engineer  
R. Calia, WEC Performance Improvement Manager  
M. Connor, SNC CAP Manager  
F. Hundley, SNC Performance Improvement & Corrective Action Program Manager  
C. Kelley, Fluor QC Electrical, Vogtle 3&4  
C. Long, Fluor QC Modules Supervisor, Vogtle 3&4  
L. McClernan, WECTEC CAP  
C. Montgomery, SNC Medical Services Manager  
J. O'Dell, SNC Licensing  
R. Pennenga, WECTEC OE/CE Coordinator, Vogtle 3&4  
L. Reaves, WEC ECP Manager  
D. Rose, WEC ECP Manager  
P. Shaw, WEC Licensing Engineer  
D. Swain, SNC Trending Coordinator  
M. Washington, Vogtle 3&4 Licensing Supervisor - Construction

### LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

<u>Item Number</u>	<u>Type</u>	<u>Status</u>	<u>Description</u>
05200025/2017007-01	Licensee Identified Violation	Open/Closed	Inadequate Implementation of CAQ Definition
05200026/2017007-01	Licensee Identified Violation	Open/Closed	Inadequate Implementation of CAQ Definition

### LIST OF DOCUMENTS REVIEWED

#### Section 1P01

#### Procedures

APP-GW-AGL-026, Rev. 2.0, AP1000 Implementation of the RTNSS Process  
APP-GW-GAH-020, AP1000® Plant Systems, Structures, and Components Quality Requirements, Rev. 6  
APP-GW-GAM-200, AP1000 Quality Assurance Requirements for RTNSS SSCs, Rev. 2.0  
APP-GW-GAP-420, Engineering and Design Coordination Reports, Rev. 13  
APP-GW-GAP-428, Nonconformance and Disposition Report (N&D), Rev. 11  
APP-GW-GL-014, AP1000® Plant Nuclear Safety Classification and Seismic Requirement Methodology, Rev. 8  
APP-GW-GL-022, Rev. 8, AP1000 Probabilistic Risk Assessment

APP-GW-GL-026, AP1000 Implementation of the Regulatory Treatment of Nonsafety-Related Systems Process, Rev. 2  
 APP-GW-GRR-009, AP1000 Design Reliability Assurance Program, Rev. 3  
 APP-PLS-GR-002, AP1000 Plant Control System Reliability Analysis, Rev. 0  
 APP-PLS-J7X-001, AP1000 Plant Control System Equipment Classification List, Rev. 2  
 B-GEN-ENG-003-002, Master Equipment List (MEL) Acquisition and Processing, Rev. 3  
 ND-AD-002, SNC Nuclear Development Corrective Action Program, Revs. 24, 25, and 26  
 ND-AD-002-010, Performance Monitoring and Trending, Rev. 2  
 ND-AD-006, SNC Nuclear Development Cause Analysis, Rev. 13.0  
 ND-AD-006-001, Cause Analysis and Corrective Action Guideline, Rev. 5.0  
 ND-AD-VNP-001, Interface of Corrective Action Processes, Revs. 5.0 and 6.0  
 ND-AD-VNP-006, Nuclear Development Cause Analysis, Rev. 13.0  
 ND-LI-001, 10 CFR Part 21 and 10 CFR 50.55(e) Evaluating and Reporting of Defects and Noncompliance for Nuclear Development, Revisions 12.0 and 13.0  
 QAD 12.01, Verification of Measured Data, Rev. 2.01  
 QS 16.03, Identifying and Reporting Defects and Failures to Comply Under 10 CFR Part 21 and 10 CFR Part 50.55(e), Rev. 6.0  
 W2-5.1-101, Westinghouse Corrective Action Program Procedure, Rev. 3.0  
 W2-5.1-102, Westinghouse Issue Review Committee, Rev. 3.0  
 W2-5.1-104, Apparent Cause Analysis, Rev. 1.1  
 W2-5.1-105, Limited Cause Analysis, Rev. 1.0  
 W2-5.1-106, Common Cause Analysis, Rev. 1.0  
 W2-5.1-201, Identification and Reporting of Conditions Adverse to Nuclear Safety, Rev. 0.1

Corrective Action Prevention and Learning (CAPALs), Corrective Action Requests (CARs), and Condition Reports (CRs)

CAPALs:

CAPAL 100000157, Lack of Tool and Human Diversity Between CIM and DAS  
 CAPAL 100171012, Impacts of Freeze Seals on AP1000 Class 1 Piping  
 CAPAL 100337234, CCS relief valve discharge protection  
 CAPAL 100360628, SNC ICAP CR 10177789 Inadequate CAPAL Justification 100337234  
 CAPAL 100396286, ITAAC Testing of Class 1E Components from their respective divisions  
 CAPAL 100396729, Error in APP-GW-PVR-003  
 CAPAL 100398439, SNC CR: 10249827 - WECTEC CAPAL Implementation of SNC Identified Issues - Level 3 Finding ND-QA-003  
 CAPAL 100398469, SNC CR 10249836 - WECTEC Implementation of CAPAL- Employees Missing Required Training ND-QA-003 Lv 3.  
 CAPAL 100400789, SWS cooling fan motor rating larger than specified in design documents  
 CAPAL 100401628, SNC CR: 10254648 - NRC IOC 16-029 - N&D, SV4-ML05-GNR-000002, Missing Part 21 Evaluation  
 CAPAL 100402907, Bolt holes on the butterfly valve  
 CAPAL 100407589, SNC ICAP CR 10259914 Inconsistencies Identified in PCS V001A/B/C description between UFSAR Rev. 5  
 CAPAL 100410146, Q240 Module Valve / Actuator SV3-RNS-PL-V023 was disassembled incorrectly  
 CAPAL 100410795, Weld Cracks on CA Floor Modules  
 CAPAL 100410872, Revise MG02 Documents to Invoke APP-GW-GAM-200 Requirements  
 CAPAL 100411488, eCAR XFER-2015-4644: Overdue Out of Tolerance Reports  
 CAPAL 100414159, NRC Identified: Vogtle Unit 3 SBW Missing Reinforcing Steel  
 CAPAL 100421142, SNC ICAP CR 10281246 WEC Response to CAR 265925/DI 10003650

CAPAL 100422419, SNC ICAP CR 10281680 Digital Testing – PMS Site Acceptance Testing  
 CAPAL 100424057, APP-GW-J4-107: DAS-PLS—028 missing PLS allocation  
 CAPAL 100425201, SV4-CA03-01 Undersized Stud Weld  
 CAPAL 100425742, Failed Calibrated M&TE Report not turned in to SQCM within 45 days from receipt  
 CAPAL 100429780, Safety Evaluation for E&DCR APP-ES02-GEF-016  
 CAPAL 100431096, IEEE384 Testing of DK01 CR5/CR6 Relay Seal-In  
 CAPAL 100440685, Fix APP-CCS-M3C-100  
 CAPAL 100454571, CAPALs not being screened conservatively at Cranberry  
 CAPAL 100457341, Fix CAS and SWS 100 calcs  
 CAPAL 100470672, Additional Review of CAPAL Classification as CAQ  
 CAPAL 100477148, SNC Vogtle ICAP 10373352 Surveillance NDQA-2017-S013 Level 1 Finding  
 CAPAL 100478067, Violation of QAD 12.01 Revision 02.01

CARs:

CAR 2015-1122, Out of Tolerance reports not getting evaluated and closed out in a timely manner  
 CAR 2015-4320, Adverse trend in quality of pipe of ASME III pipe  
 CAR 2015-4644, Overdue Out of Tolerance Reports  
 CAR 263540, Track & Evaluate WEC CAPAL # 100360628  
 CAR 266365, IOC 16-029; No Part 21 Evaluation for N&D  
 CAR 266568, NRC Reportable Event  
 CAR 266632, Created in error  
 CAR 267166, Part 21 Event 52236, Deviations on Structural Module Vogtle Unit 3 AP1000 Project  
 CAR 267201, SNC Reportability Evaluation for Part 21 EN 52269  
 CAR 267393, NRC notification of HR-related issue at Vogtle 1&2, October 28, 2016  
 CAR 268972, MRC approved downgrade of Cause analysis type, dated March 13, 2017  
 CAR 269801, NRC SL IV Notice of Violation FFD  
 CAR 269835, Part 21 fin 2017-02, Fisher's standard seismic mounting bracket  
 CAR 270030, Part 21 Event 52762, Bettis brand seismic qualified G series spring return actuators

CRs:

CR 846337, FFD issues/incidents identified in General Contractor's FFD program  
 CR 100398012, APP-CCS-PLR-810 Incorrect B31.1 EQ9F Evaluation  
 CR 100426858, Unclear design tolerance for piping installation in APP-GW-P0-008  
 CR 10177789, Inadequate CAPAL Justification  
 CR 10230514, Service Water Strainer Backwash Valve Cycle timer control not in accordance with design documents  
 CR 10230582, Inadequate Closure of CAPAL 100000157 (CAR 263302)  
 CR 10241687, WEC Resolution of CAPAL 100363258 (CAR 263747) is inadequate  
 CR 10247603, IOC 16-024: Unit 4 Submodule CA01-37 Dimensions Out of Tolerance  
 CR 10249827, SNC Joint Surveillance NDQA-2016-S019 Finding #1 (Level 3)  
 CR 10249836, SNC Joint Surveillance NDQA-2016-S019 Finding #2 (Level 3)  
 CR 10249843, SNC Joint Surveillance NDQA-2016-S019, Recommendation 1  
 CR 10249847, SNC Joint surveillance NDQA-2016-S019, Recommendation 2  
 CR 10250150, Non-Conforming WLS Pumps Found Without Hold Tag  
 CR 10254648, IOC 16-029; No Part 21 Evaluation for N&D  
 CR 10267648, NRC Reportable Event

CR 10268592, CAPAL 100171012 response did not address issue in CAR 259579 (Q233)  
 CR 10274783, VC Summer NRC Observations - RTNSS  
 CR 10276467, Residual Heat removal System Chemistry Management  
 CR 10282381, SNC Reportability Evaluation for Part 21 EN 52269  
 CR 10286105, Part 21 Event 52236, Deviations on Structural Module Vogtle Unit 3  
 AP1000 Project  
 CR 10310365, RNS-PL-V024 & RNS-PL-V055 Safety Function Discrepancy in UFSAR Table  
 31.6-3 'List of AP1000 SR'  
 CR 10314316, U3 RNS Stainless Steel to Carbon Steel Piping Contamination  
 CR 10319189, Apparent Discrepancy between CCS normal alignment and TRM-3.7.3  
 CR 10329544, Incorrect EQ Classifications in UFSAR Table 7.5-1, February 10, 2017  
 CR 10339586, Deltas between the Westinghouse Cyber review and V34 MEL  
 CR 10345043, Failure of Contractor Oversight  
 CR 10360797, NRC SL IV Notice of Violation FFD  
 CR 10364525, Part 21 fin 2017-02, Fisher's standard seismic mounting bracket.  
 CR 10372268, Part 21 Event 52762, Bettis brand seismic qualified G series spring return  
 actuators  
 CR 10373352, Surveillance NDQA-2017-S013 Level 1 Finding  
 CR 10380732, Need FSAR Change  
 CR 10382028, Training Request for Test Engineers on SIMOCODE Devices, June 28, 2017

#### Trending Corrective Action Documents and Reports

CAPAL 100452293, Potential Trend in Quality missed opportunities  
 CAR 2014-2399, Continuing Trend in working without proper documentation and welding issues  
 CAR 2015-3775, Adverse trend pertaining to work package quality  
 CR 100391466, Potential Trend in Work Package Maintenance  
 CR 100455036, Potential Trend developing safety plans and procedure roll-outs  
 SNC Event Code Statistical Trending, Fourth Quarter 2016  
 SNC Event Code Statistical Trending, First Quarter 2017  
 Westinghouse Quarterly Trend Report, Vogtle Units 3&4, Fourth Calendar Quarter 2016  
 Westinghouse Quarterly Trend Report, Vogtle Units 3&4, First Calendar Quarter 2017

#### Causal Analyses

CAPAL 100413017, SNC ICAP CR 10271212 IOC 16-034: Minor Violation of Criterion V-  
 Instructions, Procedures, and Drawings, dated September 15, 2016  
 CAPAL 100436977, Performance deficiency CR 10308295 and CR 10308213, IOC 16-062/ IOC  
 17-012 (CR 10336421), dated December 15, 2016  
 SNC CAR 269709, NRC SL IV Notice of Violation FFD, Direct Cause Evaluation  
 WEC Limited Cause Analysis Report 100469375, Notice of Violation  
 Westinghouse Apparent Cause Analysis Report 100450198, Impact of CAQ Definition Change  
 Apparent Cause Analysis: Work Package Quality, Adverse Trend, 3/28/2016  
 Apparent Cause Analysis: 2016 Independent NSCA  
 Common Cause Analysis: Adverse Trend Related to Work Package Quality and Maintenance at  
 Vogtle Units 3&4, 10/26/2016

#### Technical Evaluations (TEs)

TE 576702, SGS System Owner Tracking TE, January 22, 2013

TE 976553, NRC notification of HR-related issue at Vogtle 1&2, January 4, 2017  
 TE 981289, Deltas between the Westinghouse Cyber review and V34 MEL  
 TE 981296, Deltas between the Westinghouse Cyber review and V34 MEL

#### Engineering and Design Coordination Report (E&DCRs)

APP-1100-GEF-424, CAPAL 100440884 Closure, Rev. 0  
 APP-FHS-GEF-030, Rev. 0, Spent Fuel Storage Capacity Limit, Rev. 0  
 APP-GW-GEE-5021, Class 1 E MOV Locked Rotor Current Increase, Rev. 0  
 APP-GW-GEF-1571, Prevention of a Fire Induced Spurious Fourth Stage ADS Actuation  
 Related to NPI-00343, Rev. 0  
 APP-ECS-GEF-850077, PLS Updates for ED-23 CWDs, Rev. 0  
 APP-ECS-GEF-850078, PLS Updates for EK-21 CWDs, Rev. 0  
 APP-ECS-GEF-850079, PLS Updates for EK-14 CWDs, Rev. 0  
 APP-PV01-GEF-047, Changes to PV01 Power Requirement Tables, Rev. 0  
 SV0-1208-GEF-000026, Shield Building NDE Allowance, Rev. 0

#### Nonconformance & Disposition (N&Ds) Reports

SV3-1208-GNR-000070, Shield Building Closed WDS's, Rev. 0  
 SV3-ME02-GNR-000001, PRHR-HX missing RT examinations per CAPAL 100461922, Rev. 0  
 SV3-RCS-GNR-000007, ASME III Pipe Spool did not meet Minimum Wall Thickness  
 Requirements, Rev. 0  
 SV4-CA03-GNR-000028, SV4-CA03-01 - Under sized Manual Stud Weld, Rev. 0  
 SV4-ML05-GNR-000002, DVI Penetration SV4-11205-ML-P01 Imperfection, Rev. 0  
 SV4-ML05-GNR-000006, DVI Penetration SV4-11205-ML-P01 Linear Indications, Rev. 0  
 SV4-ML05-GNR-000016, DVI Penetration SV4-11205-ML-P01 Linear Indication, Rev. 0

#### Miscellaneous

APP-GW-GEE-444, MOV Post Accident Monitoring Requirements, Rev. 3  
 APP-GW-G1-014, AP1000 Plant Nuclear Safety Classification and Seismic Requirement  
 Methodology, Rev. 8  
 APP-GW-P0-008, AP1000 Specification for Field Fabricated Piping and Installation, ASME III,  
 Code Classes 1, 2, and 3 and ASME B31.1, Rev. 6  
 APP-ML05-V2-102, AP 1000 Standard Penetration Open Sleeve – Lined Wall Chart, Rev. 4  
 APP-ML05-V2-221, AP 1000 Special Penetrations Sleeve W/ Bellows 110205-ML-P03/SP11  
 Detail, Rev. 3  
 APP-PMS-GEF-169, PMS Category I Changes Related to DCP-444, Rev. 0  
 BFS-AP1000-CGDP-S/S-1, Commercial Grade Dedication Plan  
 Course # 6\_693801, WEC Data Analyst Trend Training  
 Event Report Number 52208  
 Event Report Number 52236  
 Event Report Number 52269  
 Event Report Number 52762  
 Fisher Drawing 22A7618, Type 546: Mounting Bracket Bulkhead Style MTG, Rev. B  
 Fisher Drawing 35a4153, Type 546: Mounting Plate Seismic Alphabetical, Rev. C  
 Fisher Information Notice 2017-02, dated 4/13/2017  
 Material Receiving Report 132176-C607.02-SBOM-174820  
 MEL package HMEL-17-000017, MEL Cyber Review Components, Version 6/30/2017

ND-16-2659, Work Package, 12/14/2016  
 ND-LI-001-F02-CR10178419, Determination of Notification and Reporting Requirements for CR10178419  
 ND-LI-001-F02-CR10178434, Determination of Notification and Reporting Requirements CR10178434  
 ND-LI-001-F02-CR10282381, Determination of Notification and Reporting Requirements CR10282381  
 ND-LI-001-F02-CR10351594, Determination of Notification and Reporting Requirements for 10351594  
 Out Of Tolerance Report (OOTR) V-OT-17-0074, Failed Calibrated M&TE Evaluation V-N-0141, dated 5/5/2017  
 OOTR V-OT-17-0075, Failed Calibrated M&TE Evaluation V-4L-0029 dated 5/9/2017  
 OOTR V-OT-17-0076, Failed Calibrated M&TE Evaluation V-4L-0018, dated 5/9/2017  
 OOTR V-OT-17-0078, Failed Calibrated M&TE Evaluation V-AD-0058, dated 5/18/2017  
 OOTR V-OT-17-0079, Failed Calibrated M&TE Evaluation V-N-0140, dated 5/17/2017  
 OOTR V-OT-17-0089, Failed Calibrated M&TE Evaluation V-N-0138, dated 6/22/2017  
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 Quality Assurance Inspection Report 32176-QA-Q445-011-13-000348  
 Quality Assurance Inspection Report Q445-16-11215  
 Quality Receipt Inspection Report 132176-QA-Q445-011-13-000348  
 SECY-94-084, Policy And Technical Issues Associated With The Regulatory Treatment Of Non-Safety Systems In Passive Plant Designs  
 SECY-95-132, Policy And Technical Issues Associated With The Regulatory Treatment Of Non-Safety Systems (RTNSS) In Passive Plant Designs  
 SNC Compliance Investigation Report 2014003362  
 SNC Nuclear Development Quality Assurance Manual Part III, Version 16.0  
 SV4-ML05-MLW-ME7663, dated 4/15/2014  
 SV4-SS01-Z0-003, Embedment and Miscellaneous Steel, Westinghouse Safety Class C, Rev. 4  
 SVP-SV0-004230, 10CFR21/10CFR50.55(e) Evaluation Regarding A Defect Associated With Pipe Spool Supplied by CB&I-Laurens to Aecon For Installation in CA01 Module for Vogtle Unit 3 dated 10/3/2016  
 Trend Coordinator Qualifications for D. Swain  
 Vogtle Electric Generating Plant Unit 3 and 4 Updated Final Safety Analysis Report, Rev. 5.2  
 WECTEC Vogtle Units 3 & 4 Project Quality Assurance Plan, dated September 14, 2016  
 Westinghouse DCP 007924, Part 21 Review of CAPAL 100360628  
 Westinghouse RTNSS White Paper

#### Corrective Actions Initiated in Response to NRC

CAPAL 100485420, SNC Vogtle ICAP CR 10389671 IOC 17-032; NRC CAP inspection N&D does not provide adequate justificat  
 CAPAL 100482542, RTNSS components not identified in CAP  
 CAPAL 100483103, Additional Reviews of CAQ Downgrades Identified  
 CAPAL 100472903, RTNSS Treatment in Site Procedures  
 CR 10391959 IOC 17-037, NRC CAP Inspection Observation, Effectiveness Review  
 CR 10391972, IOC 17-038, NRC CAP Inspection, ECP Documentation Observation  
 CR 10389687, IOC 17-030, PD, RTNSS Classification in CAP Procedures  
 CR 10391946, IOC 17-035; NRC CAP Inspection Part 21/50.55e Reportability Observation  
 CR 10389671, IOC 17-032; NRC CAP inspection N&D does not provide adequate justification  
 CR 10391953, IOC 17-036; WECTEC Part 21/50.55e reportability Observation



**Section 1P02**Procedures

BMS-CI-10, Operating Experience, Rev. 2.0

ND-AD-VNP-004, Construction Experience Program, Revs. 10.0 and 11.0

NMP-GM-008, Operating Experience Program, Revs. 17, 17.1, 17.2, and 17.3

Corrective Action Prevention and Learning (CAPALs), Corrective Action Requests (CARs), and Condition Reports (CRs)

CAPAL 100427370, SNC CR 10291564 RCP start during solid plant – Lessons Learned from China

CAPAL 100449476, ICES 325963- Foreign Material found during post-installation SG secondary side inspection

CR 10235285, Westinghouse unacceptable response to NRC Information Notice (IN) 2016-01

CR 10291564, RCP start during solid plant – Lessons Learned from China

CR 10312604, NRC Information Notice 2015-13, Main Stream Isolation Valve Failure Events

CR 10364522, NRC Information Notice (IN) 2017-01, Reactor coolant System Leakage from a Control Rod Drive Threaded Connection

Technical Evaluations (TEs)

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Miscellaneous

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ICES Report 408008, Human Factor Engineering (HFE) Requirements Communicated to Vendors, dated April 13, 2017

ND-AD-VNP-004-F04, Construction Experience (CE) Screening Committee Meeting Minutes, Version 1.0, for dates June 15, 2017 through July 13, 2017

NRC Information Notice (IN) 2015-13, Main Steam Isolation Valve Failure Events, December 10, 2015

NRC IN 2017-01, Reactor Coolant System Leakage From a Control Drive Threaded Connection, May 3, 2017

**Section 1P03**Corrective Action Prevention and Learning (CAPALs), Corrective Action Requests (CARs), and Condition Reports (CRs)

CAR 266211, SNC Joint Surveillance NDQA-2016-S019 Finding #1 (Level 3)

CAR 266212, SNC Joint Surveillance NDQA-2016-S019 Finding #2 (Level 3)

Miscellaneous

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 ND-17-0076, Response to Contractor Revision to Corrective Action Program  
 ND-17-1106, NDQA Surveillance Report for WEC/WECTEC Corrective Actions, SNC NDQA-2017-S013  
 S-132175-2016-074, Joint Surveillance WECTEC's Implementation of CAPAL,  
 S-132175-2016-166, Joint Surveillance of CAP Backlog, Rev. 002  
 S-132175-2017-008, Effective Implementation of the Corrective Action Programs (CAPs) / Project Letter Responses (PLRs), Rev. 2  
 SNC Check-In-Self Assessment (CISA) Plan and Report, June 27-July 1, 2016  
 SNC 2016 CISA of Construction FFD/AA Program – Review of 12 Findings

**Section 1P04**Procedures

730-002, Employee Concerns Guidance, Dated March 13, 2017  
 BMS-LGL-75, Employee Concerns Program Procedure, Rev. 0  
 BMS-LGL-78, ECP Work Instructions, Rev. 0  
 ND-AD-014, Nuclear Safety Culture Monitoring, Rev. 1.0  
 WECTEC-NSC-PL-01, Nuclear Safety Culture Policy, Rev. 1  
 WECTEC-NSC-PR-01, Maintaining a Positive Nuclear Safety Culture & a Safety Conscious Work Environment, Rev. 01  
 WECTEC-NSC-PR-05, Nuclear Safety Culture Surveys and Assessments, Rev. 1

Corrective Action Prevention and Learning (CAPALs), Corrective Action Requests (CARs), and Condition Reports (CRs)CAPALs:

CAPAL 100399493, SNC CR-10250983 NRC CAP Audit Results  
 CAPAL 100399839, Anonymous – FFD for Cause Concern Not Addressed  
 CAPAL 100402562, Employee Concerns Program Exit Interviews  
 CAPAL 100404703, Anonymous – Planned Ongoing Harassment and Intimidation  
 CAPAL 100407536, CWS PCCP Interference  
 CAPAL 100409065, Anonymous – Double Standard  
 CAPAL 100411979, Fasteners Marked for Temporary Use Only  
 CAPAL 100412170, 2016 Independent NSCA  
 CAPAL 100415628, DCP-444 Missed Impact for RNS-V022  
 CAPAL 100422482, Overdue ECP Action  
 CAPAL 100422823, Overdue ECP Action  
 CAPAL 100424401, Potential trend of Untimely Significance Reviews  
 CAPAL 100429337, Potential Trend on 10% UT not met  
 CAPAL 100430111, Anonymous  
 CAPAL 100431344, 2016 ECP Self-Assessment  
 CAPAL 100431354, 2016 ECP Self-Assessment Finding  
 CAPAL 100435304, Anonymous: F-APP-GW-GAP-420-3 is not current in Vogtle SDC  
 CAPAL 100437533, Anonymous – Supervisor Threatened Employees

CAPAL 100438205, SV3-RNS-MP-01A PM attribute not captured within Preventative Maintenance

CAPAL 100439755, Overdue ECP Action

CAPAL 100440771, Fix APP-SWS-M3C-100

CAPAL 100446966, Anonymous – No training on new paperwork and procedures

CAPAL 100448883, Fluor craft managers supervising craft without being in Behavior Observation Program

CAPAL 100449310, Anonymous – Discrimination

CAPAL 100450715, Anonymous – Quality – Carbon and stainless materials storage

CAPAL 100474009, Violation of WECTEC-NSC-PR-03, Executive Review Board

#### CARs:

CAR 2014-2399, Continuing Trend in working without proper documentation and welding issues

CAR 266505, Safety Conscious Work Environment

CAR 266507, Safety Conscious Work Environment

CAR 266508, Safety Conscious Work Environment

CAR 267973, Safety Conscious Work Environment

CAR 268863, Safety Conscious Work Environment

#### CRs:

CR 10266086, Declining Safety Culture

CR 10265757, (Anonymous) Nuclear Safety Culture Training Observation

CR 10267164, (Anonymous CR) Using Law Firm that defends Utilities against SCWE claims

CR 10308087, (Anonymous CR) Possible willful neglect and chilled work environment

#### Miscellaneous

Letter to Khristi Driver, Follow-Up Concerns Program Assessment – Report No. SNC2016-01, dated March 21, 2017

NU-NSC-3000, Our Nuclear Safety Culture Training

S-132175-2016-066, WECTEC Nuclear Safety Culture Surveillance Report, Rev. 002

S-132175-2017-226, Effectiveness of Vogtle NSC Improvement Plans, Rev. 002

SNC2016-01, Southern Nuclear Operating Company Concerns Program Assessment, dated July 19, 2016

SNC CISA, NSC Process Implementation – IORSMSB14347, dated January 5 – 11, 2017

Vogtle Nuclear Safety Culture Improvement Plan for 2017

Vogtle Nuclear Safety Culture (NSC) Recovery Plan, December 12, 2016

WECTEC Vogtle Employee Concerns Program, Self-Assessment Report, November 22, 2016

WECTEC Vogtle Nuclear Safety Culture Assessment, dated August 2016

## **4. OTHER INSPECTION RESULTS**

### **40A7 Licensee-Identified Violations.**

No Additional Documents

## LIST OF ACRONYMS

ADAMS	Agency-wide Documents Access and Management System
CAP	Corrective Action Program
CAPALs	Corrective Action Prevention and Learnings
CAQ	Condition Adverse to Quality
CFR	Code of Federal Regulations
CIPIMS	Construction Inspection Program Information Management System
COL	Combined License
ConE	Construction Experience
CR	Condition Reports
cROP	Construction Reactor Oversight Process
DCO	Division of Construction Oversight
E&DCRs	Engineering and Design Coordination Reports
ECP	Employee Concern Programs
EPC	Engineering, Procurement, and Construction
IMC	Inspection Manual Chapter
IP	Inspection Procedure
IR	Inspection Report
ITAAC	Inspections, Tests, Analyses, and Acceptance Criteria
LIV	Licensee-Identified Violation
M&TE	Measuring and Test Equipment
N&Ds	Nonconformance and Disposition reports
NCV	Non-Cited Violation
NRC	Nuclear Regulatory Commission
NSC	Nuclear Safety Culture
N&Ds	Nonconformance and Disposition reports
OE	Operating Experience
PARS	Publically Available Records
PD	Performance Deficiency
QA	Quality Assurance
QAPD	Quality Assurance Program Description
RTNSS	Regulatory Treatment of Non-Safety Systems
SCAQ	Significant Condition Adverse to Quality
SCWE	Safety Conscious Work Environment
SDP	Significance Determination Process
SNC	Southern Nuclear Operating Company, Inc.
SSC	Structure, System or Component
UFSAR	Updated Final Safety Analysis Report
VEGP	Vogtle Electric Generating Plant
WEC	Westinghouse