



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION II
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December 19, 2017

Michael Yox
VEGP 3 & 4 Regulatory Affairs Director
Southern Company
7825 River Road
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SUBJECT: ERRATA FOR VOGTLE UNIT 3 COMBINED LICENSE, VOGTLE UNIT 4
COMBINED LICENSE NRC INTEGRATED REPORTS 05200025/2016001,
05200026/2016001

Dear Mr. Yox:

On May 10, 2016, the U.S. Nuclear Regulatory Commission (NRC) issued the subject report, Agencywide Documents Access and Management System (ADAMS) Accession Number ML16132A557. In reviewing this report, the NRC found that further clarification of the Construction Significance Determination for the Green Non-Cited Violation (NCV) was required. Accordingly, we are providing a revised version. We request that you replace page 29 of the report with the revised pages in the Enclosure to this letter.

In accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding," of the NRC's "Agency Rules of Practice and Procedure," 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 ADAMS. ADAMS is accessible from the NRC Website at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room). To the extent possible, your response should not include any personal privacy or proprietary information so that it can be made available to the public without redaction.

Sincerely,

/RA/

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

Docket Nos.: 5200025, 5200026
License Nos: NPF-91, NPF-92

Enclosure: Replacement for page 29 of the letter NRC Program Inspection or Corrective Action
Program Implementation Inspection

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COMBINED LICENSE NRC INTEGRATED REPORTS 05200025/2016001,
05200026/2016001

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Publicly Available Non-Publicly Available Sensitive Non-Sensitive SUNSI Review Complete Form 665 Attached

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SIGNATURE	AP	JH				
NAME	T. Ponko	J. Heisserer				
DATE	12/19/2017	12/19/2017				

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The finding was considered more than minor because the performance deficiency represented a substantive failure to adequately implement a quality assurance process that rendered the quality of an SSC indeterminate.

The inspectors determined that the finding represented an ITAAC finding because it was material to the acceptance criteria of VEGP Units 3 and 4 ITAAC 763, in that, if left uncorrected, the licensee may not have been able to demonstrate that the acceptance criteria of these ITAAC were met. The acceptance criteria of these ITAAC require that all deviations between the as-built structures and the approved designs be reconciled to verify that the as-built structures will withstand the design basis loads without a loss of structural integrity or other safety-related functions. The inspectors determined that the failure to adequately review and accept nonconforming items in accordance with documented procedures may have resulted in a deviation from the approved design that would not have been reconciled by the licensee.

The inspectors concluded the finding was associated with the Design / Engineering Cornerstone. The inspectors evaluated the finding in accordance with IMC 2519, "Construction Significance Determination Process," and determined the finding was of very low safety significance because the finding is associated with a portion of a structure (auxiliary building) assigned to the intermediate risk column of the AP1000 construction significance determination matrix.

The inspectors reviewed the finding for a possible cross-cutting aspect in accordance with IMC 0613 Appendix F, "Construction Cross-Cutting Areas and Aspects," and determined the finding has a cross-cutting aspect in the Human Performance area because the licensee's contractor WEC failed to use decision making-practices that emphasized prudent choices over those that were simply allowable. Specifically, the sampling plans developed to evaluate the nonconforming welds were not compliant with licensing commitments and, based on industry standard sampling practices and principles, insufficient to conclude with reasonable assurance that the nonconforming welds met the acceptance criteria of AWS D1.1:2000. [H.14].

Enforcement

10 CFR 50 Appendix B, Criterion XV, "Nonconforming Materials, Parts, or Components," requires, in part, that nonconforming items shall be reviewed and accepted, rejected, repaired or reworked in accordance with documented procedures.

Procedure APP-GW-GAP-428, "Control of Nonconforming Items for the AP1000 Program," Rev. 6, Section 7.21.1 states that deviations to design requirements with a disposition of "Repair" or "Use as is" shall be reviewed for licensing impact per APPGW-GAP-147.

Procedure APP-GW-GAP-147, "AP1000 Current Licensing Basis Review," Revision 2, Section 2.0 states, in part, that AP1000 Activities, shall be reviewed against the current licensing basis to check they comply with licensing commitments.

UFSAR Section 3.8.4.2, "Applicable Codes, Standards, and Specifications" lists AISC N690-94 as being applicable to the design, material, fabrication, construction, inspection, and testing of Seismic Category I structures of the Auxiliary Building.

The finding was considered more than minor because the performance deficiency represented a substantive failure to adequately implement a quality assurance process that rendered the quality of an SSC indeterminate.

The inspectors determined that the finding represented an ITAAC finding because it was material to the acceptance criteria of VEGP Units 3 and 4 ITAAC 763, in that, if left uncorrected, the licensee may not have been able to demonstrate that the acceptance criteria of these ITAAC were met. The acceptance criteria of these ITAAC require that all deviations between the as-built structures and the approved designs be reconciled to verify that the as-built structures will withstand the design basis loads without a loss of structural integrity or other safety-related functions. The inspectors determined that the failure to adequately review and accept nonconforming items in accordance with documented procedures may have resulted in a deviation from the approved design that would not have been reconciled by the licensee.

The inspectors concluded the finding was associated with the Design/Engineering Cornerstone. The inspectors evaluated the finding in accordance with IMC 2519, "Construction Significance Determination Process," and determined the finding was of very low safety significance because the finding is associated with a portion of a structure (auxiliary building) assigned to the intermediate risk column of the AP1000 Construction Significance Determination Matrix. At the time of the inspection, the quality of the welds was determined to be indeterminate as insufficient information was available to determine whether the portion of the impacted structure could meet its design function. Subsequently, the licensee submitted information to demonstrate that the portion of the affected structure could meet its design function under License Amendment Request (LAR) 16-027 (ML16294A521). The NRC completed its review and issued amendments 85 and 86 on September 5, 2017 (ML17178A197). As a result, the inspectors were able to conclude that the finding should be assigned to row 1 of the Construction Significance Determination Matrix.

The inspectors reviewed the finding for a possible cross-cutting aspect in accordance with IMC 0613 Appendix F, "Construction Cross-Cutting Areas and Aspects," and determined the finding has a cross-cutting aspect in the Human Performance area because the licensee's contractor WEC failed to use decision making-practices that emphasized prudent choices over those that were simply allowable. Specifically, the sampling plans developed to evaluate the nonconforming welds were not compliant with licensing commitments and, based on industry standard sampling practices and principles, insufficient to conclude with reasonable assurance that the nonconforming welds met the acceptance criteria of AWS D1.1:2000. [H.14].

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