



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 11, 2018

MEMORANDUM TO: Terry W. Jackson, Chief
Quality Assurance Vendor Inspection Branch-1
Division of Construction Inspection
and Operational Programs
Office of New Reactors

FROM: Yamir Diaz-Castillo, Inspection Team Leader /RA/
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Office of New Reactors

SUBJECT: CLOSURE OF ITAAC RELATED-FINDING FOR SPECIALTY
MAINTENANCE AND CONSTRUCTION INC. INSPECTION
REPORT NO. 99901439/2015-201

The purpose of this memorandum is to document the U.S. Nuclear Regulatory Commission (NRC) staff's closure of the Notice of Nonconformance (NON) documented in Specialty Maintenance and Construction Inc.'s (here after referred to as SMCI) Inspection Report (IR) No. 99901439/2015-201, dated July 24, 2015 (Agencywide Document Access and Management System (ADAMS) Accession No. ML15175A446). The NRC staff chose to issue this memorandum due to SMCI going out of business in December 2016.

On June 8-12, 2015, the NRC staff completed an inspection at the SMCI facility in Lakeland, FL. The purpose of this technically-focused, limited scope reactive inspection was to evaluate SMCI's implementation of quality activities associated with the fabrication of the embed plates for the CA-01 (steam generator and refueling canal modules) and CA-02 (independent wall structure connecting CA-1 and CA-03 (in-containment refueling water storage tank module)) modules for the Westinghouse Electric Company's (WEC) AP1000 reactor design for the Vogtle Electric Generating Plant, Units 3 and 4, currently under construction.

In IR No. 99901439/2015-201, the NRC staff issued NON 99901439/2015-201-01 and NON 99901439/2015-201-02, which the NRC staff determined were material to the acceptance criteria of inspections, tests, analyses, and acceptance criteria (ITAAC) No. 3.3.00.02a.i.a (760) from Revision 19 of the certified AP1000 Design Control Document.

NON 99901439/2015-201-01 documents a finding against Criterion III, "Design Control," and Criterion IX, "Control of Special Processes," of Appendix B, "Quality Assurance Program Criteria for Nuclear Power Plants and Fuel Processing Plants," to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities," for SMCI's failure to transfer all the pertinent design requirements into the applicable instructions and failure to inspect welds in accordance with the applicable travelers and design specification

drawings. NON 99901439/2015-201-02 documents a finding against Criterion IX of Appendix B to 10 CFR Part 50 for SMCI's failure to control welding consumable filler metal in accordance with applicable procedures and criteria.

In a letter dated August 18, 2015 (ADAMS Accession No. ML15239A703), SMCI described their corrective actions to address the issues identified in NON 99901439/2015-201-01 and NON 99901439/2015-201-02. In letters dated September 17, 2015, (ADAMS Accession No. ML15258A654), and January 8, 2016 (ADAMS Accession No. ML16007A704), the NRC staff issued a request for information (RFI) from SMCI to provide clarification related to the information provided. In letters dated November 2, 2015 (ADAMS Accession No. ML15313A122), December 17, 2015 (ADAMS No. Accession ML15356A128), and January 27, 2016 (ADAMS Accession No. ML16029A481), SMCI provided additional information to address the NRC's RFI.

The NRC staff reviewed SMCI's responses to the RFI that support the corrective actions taken to address the issues identified in NON 99901439/2015-201-01 and NON 99901439/2015-201-02. Based on this review, the NRC staff determined the corrective actions taken by SMCI are adequate to address the identified nonconformances. NON 99901439/2015-201-01 and NON 99901439/2015-201-02 are closed and no additional inspection follow-up is required to verify completion/adequacy of the corrective actions.

Enclosure:
Summary of NRC Inspection of Specialty
Maintenance and Construction Inc.
Affecting ITAAC

SUBJECT: CLOSURE OF ITAAC RELATED-FINDING FOR SPECIALTY MAINTENANCE AND CONSTRUCTION INC. INSPECTION REPORT NO. 99901439/2015-201

Dated: April 11, 2018

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**Summary of NRC Inspection of Specialty Maintenance
and Construction Inc. Affecting ITAAC**

1. AFFECTED INSPECTIONS, TESTS, ANALYSES, AND ACCEPTANCE CRITERIA

The U.S. Nuclear Regulatory Commission (NRC) inspectors identified the following inspection, test, analysis, and acceptance criteria (ITAAC) related to components being fabricated by Specialty Maintenance and Construction Inc. facility (here after referred to as SMCI). For the ITAAC listed below, the NRC staff reviewed SMCI's corrective actions in response to Notice of Nonconformance (NON) 99901439/2015-201-01 and NON 99901439/2015-201-02. The ITAAC's design commitment referenced below are for future use by the NRC staff during the ITAAC closure process; the listing of these ITAAC design commitments does not constitute that they have been met and closed. The NRC staff identified two findings associated with the ITAAC identified below.

Source Document	ITAAC Index No.	ITAAC	Acceptance Criteria
Appendix C from the Combined License for Vogtle Electric Generating Plant Units 3 and 4	No. 760	3.3.00.02a.i.a	i.a) A report exists which reconciles deviations during construction and concludes that the as-built containment internal structures, including the critical sections, conform to the approved design and will withstand the design basis loads specified in the Design Description without loss of structural integrity or the safety-related functions.

2. FINDINGS AND OBSERVATIONS

Based on review of the additional information, the NRC staff has determined that the corrective actions taken by SMCI in response to NON 99901439/2015-201-01 and NON 99901439/2015-201-02 are adequate to address the identified nonconformances. NON 99901439/2015-201-01 and NON 99901439/2015-201-02 are closed and no additional inspection follow-up is required to verify completion/adequacy of the corrective actions.

3. ITEMS OPENED, CLOSED, AND DISCUSSED

Item Number	Status	Type	Description	Applicable ITAAC
99901439/2015-201-01	CLOSED	NON	Criterion III & IX	3.3.00.02a.i.a
99901439/2015-201-02	CLOSED	NON	Criterion IX	3.3.00.02a.i.a