



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

April 12, 2018

MEMORANDUM TO: Kerri A. Kavanagh, Chief
Quality Assurance Vendor Inspection Branch-2
Division of Construction Inspection
and Operational Programs
Office of New Reactors

FROM: Raju B. Patel, Reactor Operations Engineer /RA/
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SUBJECT: CLOSURE OF ITAAC RELATED-FINDING FOR CHICAGO
BRIDE & IRON LAKE CHARLES INSPECTION REPORT
NO. 99901425/2014-201

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 Chicago Bridge & Iron Lake Charles (here after referred to as CB&I LC) Inspection Report (IR) No. 99901425/2015-201, dated March 21, 2014 (Agencywide Document Access and Management System (ADAMS) Accession No. ML14072A315). The NRC staff chose to issue this memorandum due to CB&I LC going out of the safety-related manufacturing business in August 2016.

On February 3-7, 2014, the NRC staff completed an inspection at the CB&I LC facility in Lake Charles, LA. The purpose of this technically-focused, limited-scope routine inspection was to evaluate CB&I LC's implementation of quality activities associated with the fabrication and inspection activities of structural sub-modules for the Containment Internal Structures for the Westinghouse Electric Company's AP1000 reactor design for the Vogtle Electric Generating Plant, Units 3 and 4, currently under construction. The vendor inspection activities are documented in inspection report (IR) No. 99901425/2014-201, dated March 21, 2014 (Agencywide Document Access and Management System (ADAMS) Accession No. ML14072A315).

In IR No. 99901425/2014-201, the NRC staff issued Notice of Nonconformance (NON) 99901425/2014-201-01, which the NRC staff determined were material to the acceptance

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criteria of inspections, tests, analyses, and acceptance criteria (ITAAC) No. 3.3.00.02a.i.a (760), ITAAC No. 3.3.00.02a.i.d (763), from Revision 19 of the certified AP1000 Design Control Document.

NON 99901425/2014-201-01 documents a finding against Criterion XV, "Nonconforming Materials, Parts, or Components," of Appendix B, "Quality Assurance Program Criteria for Nuclear Power Plants and Fuel Processing Plants," to Title to 10 of the *Code of Federal Regulations* Part 50, "Domestic Licensing of Production and Utilization Facilities," for CB&I LC's failure to correctly identify unresolved nonconformances on a safety-related sub-module being prepared to ship: one stud that had an incomplete weld was incorrectly located in the documentation; one stud that was identified on the documentation as being added and having incomplete weld did not appear to exist on the module; and one stud was documented as having an incomplete weld, but was actually missing.

In a letter dated April 17, 2014 (ADAMS Accession No. ML14113A410), CB&I LC described their corrective actions to address the issues identified in NON 99901425/2014-201-01.

The NRC staff reviewed CB&I LC corrective actions taken to address the issues identified in NON 99901425/2014-201-01. Based on this review, the NRC staff has determined that the corrective actions taken by CB&I LC are adequate to address the identified nonconformance. NON 99901425/2014-201-01 is closed and no additional inspection follow-up is required to verify completion/adequacy of the corrective actions.

Enclosure:
Summary of NRC Inspection of Chicago
Bridge and Iron Lake Charles Affecting ITAAC

SUBJECT: CLOSURE OF ITAAC RELATED-FINDING FOR CHICAGO BRIDE & IRON
LAKE CHARLES INSPECTION REPORT NO. 99901425/2014-201

Dated: April 12, 2018

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ADAMS Accession No.: ML18101A168

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**Summary of NRC Inspection of Chicago Bridge & Iron Lake Charles
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 CB&I Lake Charles facility (here after referred to as CB&I LC). For the ITAAC listed below, the NRC staff reviewed CB&I LC's corrective actions in response to Notice of Nonconformance (NON) 99901425/2014-201-01. 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 one finding 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.
Appendix C from the Combined License for Vogtle Electric Generating Plant Units 3 and 4	No. 763	3.3.00.02a.i.d	i.d) A report exists which reconciles deviations during construction and concludes that the as-built structures in the radiologically controlled area of the auxiliary building, 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 CB&I LC in response to NON 99901425/2014-201-01 is adequate to address the identified nonconformances. NON 99901425/2014-201-01 is 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
99901425/2014-201-01	CLOSED	NON	Criterion XV	3.3.00.02a.i.a and 3.3.00.02a.i.d