



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

May 11, 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: Jonathan Ortega-Luciano */RA/ KKavanagh for*
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SUBJECT: CLOSURE OF INSPECTIONS, TESTS, ANALYSES, AND
ACCEPTANCE CRITERIA RELATED-FINDING FOR CIVES
STEEL COMPANY INSPECTION REPORT
NO. 99901419/2012-201

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 Cives Steel Company (hereafter referred to as Cives) Inspection Report (IR) No. 99901419/2012-201, dated March 19, 2013 (Agencywide Document Access and Management System (ADAMS) Accession No. ML13042A397).

On December 10-14, 2012, the NRC staff completed an inspection at the Cives facility in Thomasville, GA. The purpose of this technically-focused, limited-scope inspection was to evaluate Cives' implementation of quality activities associated with the fabrication of concrete embedments 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. 99901419/2012-201, the NRC staff issued Notice of Nonconformance (NON) 99901419/2012-201-03, which the NRC staff determined that two of the examples documented in this NON were material to the acceptance criteria of inspections, tests, analyses, and acceptance criteria (ITAAC) No. 3.3.00.02a.i.a (760), 3.3.00.02a.i.b (761), 3.3.00.02a.i.c (762), and 3.3.00.02a.i.d (763) from Revision 19 of the certified AP1000 Design Control Document.

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NON 99901419/2012-201-03 documents a finding against Criterion X, "Inspection," 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 Cives' failure to adequately identify a stud that did not show a full 360-degree flash and to test at least 1 out of every 100 studs welded by each operator in accordance with applicable procedures, design requirements, and industry standards.

In letters dated April 16, 2013 (ADAMS Accession No. ML13109A020), August 16, 2013 (ADAMS Accession No. ML13240A039), and October 2, 2013 (ADAMS Accession No. ML13281A243), Cives described their corrective actions to address the issues identified in NON 99901419/2012-201-03.

The NRC staff reviewed Cives' corrective actions taken to address the issues identified in NON 99901419/2012-201-03. Based on this review, the NRC staff has determined that the corrective actions taken by Cives are adequate to address the identified nonconformance. NON 99901419/2012-201-03 is closed and no additional inspection follow-up is required to verify completion/adequacy of the corrective actions.

Enclosure:
Summary of NRC Inspection of Cives Affecting ITAAC

SUBJECT: CLOSURE OF ITAAC RELATED-FINDING FOR CIVES STEEL COMPANY
INSPECTION REPORT NO. 99901419/2012-201 Dated: May 11, 2018

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ADAMS Accession No.: ML18131A260 NRO-002

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Summary of NRC Inspection of Cives 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 Cives Steel Company (here after referred to as Cives). For the ITAAC listed below, the NRC staff reviewed Cives' corrective actions in response to Notice of Nonconformance (NON) 99901419/2012-201-03. 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. 761	3.3.00.02a.i.b	i.b) A report exists which reconciles deviations during construction and concludes that the as-built shield building 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. 762	3.3.00.02a.i.c	i.c) A report exists which reconciles deviations during construction and concludes that the as-built structures in the non-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.

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.
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2. FINDINGS AND OBSERVATIONS

Based on review of the additional information, the NRC staff has determined that the corrective actions taken by Cives in response to NON 99901419/2012-201-03 is adequate to address the identified nonconformances. NON 99901419/2012-201-03 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
99901419/2012-201-03	CLOSED	NON	Criterion X	3.3.00.02a.i.a, 3.3.00.02a.i.b, 3.3.00.02a.i.c, and 3.3.00.02a.i.d