



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION II  
245 PEACHTREE CENTER AVENUE N.E., SUITE 1200  
ATLANTA, GEORGIA 30303-1200

January 25, 2021

Mr. Michael Yox  
Regulatory Affairs Director  
Southern Nuclear Operating Company  
7825 River Road, Bldg. 302, Vogtle 3&4  
Waynesboro, GA 30830

**SUBJECT: VOGTLE ELECTRIC GENERATING PLANT, UNITS 3 AND 4 – NRC  
CONFIRMATORY FOLLOW-UP AND SAFETY CONSCIOUS WORK  
ENVIRONMENT INSPECTION REPORTS 05200025/2020012,05200026/2020012**

Dear Mr. Yox:

On December 11, 2020, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Vogtle Electric Generating Plant (VEGP) Units 3 and 4. The enclosed inspection report documents the inspection results, which the inspectors discussed on December 11, 2020, with Glen Chick, Executive Vice President, and other members of your staff.

The NRC inspection team reviewed your corrective actions for Confirmatory Order (CO) Enforcement Action (EA)-18-130 and EA-18-171 (ADAMS Accession No. ML19249B612), dated November 20, 2019. Because the confirmatory order was fleet wide for the Southern Nuclear Company, the corrective actions reviewed by the inspectors also included a review of corrective actions for Hatch, Farley, and Vogtle Units 1 through 4.

The team also evaluated the VEGP Units 3 and 4 programs to establish and maintain a safety-conscious work environment (SCWE), and interviewed licensee personnel to evaluate the effectiveness of these programs. Based on the team's observations and the results of these interviews, the team found no evidence of a chilled work environment as it relates to your organization's SCWE. Your employees appeared willing to raise nuclear safety concerns through at least one of the several means available.

One Severity Level (SL) IV violation without an associated finding is identified in this document. We are treating this violation as a non-cited violation (NCV) consistent with Section 2.3.2. of the Enforcement Policy.

If you contest the violation or the significance or severity of the violation documented in this inspection report, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region II; the Director, Office of Enforcement; and the NRC Resident Inspector at the VEGP Units 3 and 4.

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 systems 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 matter, please contact us.

Sincerely,

*/RA/*

Nicole Covert,  
Branch Chief  
Construction Inspection Branch 1  
Division of Construction Oversight

Docket Nos. 05200025 and 05200026  
License Nos. NPF-91, NPF-92

Enclosure: NRC Inspection Reports (IR) 05200025/2020012 and 05200026/2020012

w/attachments: Supplemental Information

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 CONFIRMATORY FOLLOW-UP AND SAFETY CONSCIOUS WORK  
 ENVIRONMENT INSPECTION REPORTS 05200025/2020012,  
 05200026/2020012 DATED: January 25, 2021

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**U.S. NUCLEAR REGULATORY COMMISSION  
Inspection Report**

Docket Numbers: 5200025  
5200026

License Numbers: NPF-91  
NPF-92

Report Numbers: 05200025/2020012  
05200026/2020012

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

Facility: Vogtle Electric Generating Plant Unit 3 Combined License  
Vogtle Electric Generating Plant Unit 4 Combined License

Location: Waynesboro, GA

Inspection Dates: November 30, 2020 through December 11, 2020

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Approved By: Nicole Covert, Chief  
DCO, CIB1, RII

Enclosure

## SUMMARY OF FINDINGS

Inspection Report (IR) 05200025/2020012, 05200026/2020012; 11/30/2020 through 12/11/2020; Vogtle Unit 3 Combined License, Vogtle Unit 4 Combined License, Confirmatory Order (CO) Follow-Up and Safety Conscious Work Environment (SCWE) inspection report.

This report covers a two-week inspection period by regional and headquarters inspectors and safety culture assessors. The purpose of this inspection was to verify the SCWE attribute of a licensee's safety culture and to review the licensee's corrective actions required by the commitments listed in CO EA-18-130 and EA-18-171 (ADAMS Accession No. ML19249B612).

The significance of most findings is indicated by their color (i.e., greater than Green, or Green, White, Yellow, Red) which is determined using Inspection Manual Chapter (IMC) 2519, "Construction Significance Determination Process." Cross-cutting aspects are determined using IMC 0613, Appendix F, "Construction Cross-Cutting Areas and Aspects." All violations of Nuclear Regulatory Commission (NRC) requirements are dispositioned in accordance with the NRC's Enforcement Policy and the temporary enforcement guidance outlined in enforcement guidance memorandum (EGM) 11-006. The NRC's program for overseeing the safe construction of commercial nuclear power reactors is described in IMC 2506, "Construction Reactor Oversight Process General Guidance and Basis Document." Inspectors followed the guidance of NRC inspection procedures (IP) 93100, "Safety-Conscious Work Environment Issue of Concern Follow-Up," and IP 92702, "Follow-Up on Traditional Enforcement Actions Including Violations, Deviations, Confirmatory Action Letters, and Orders."

### A. NRC-Identified

The inspectors identified a Severity Level (SL) IV non-cited violation (NCV) for the licensee's failure to adequately implement requirements of CO EA-18-130 and EA-18-171 Commitment 3.a. CO EA-18-130 and EA-18-171, issued to SNC on November 20, 2019, requires, in part, that new Southern Nuclear Company (SNC) employees who are onboarding completed SCWE training, including training on 10 CFR 50.7, 10 CFR 52.5, 10 CFR 50.5, and 10 CFR 52.4, definition of adverse action as it appears in the RIS 2005-18, and acknowledge the SNC SCWE policy within two (2) months of reporting to work. The licensee entered the issues described above into their corrective action program and took action to ensure all employees identified as having missed the requirement, had completed the training by December 14, 2020.

The inspectors determined this violation constituted a more than minor traditional enforcement violation associated with failure to implement the requirements of Confirmatory Order EA-18-130 and EA-18-171. A licensee's failure to ensure current and future confirmatory order requirements are met could potentially impact safety. Additionally, a failure to ensure new SNC employees completed SCWE training in a timely manner could cause missed opportunities to identify and/or prevent an environment where individuals would be hesitant to raise nuclear safety concerns for fear of retaliation. The inspectors determined that this violation was not associated with a Construction Reactor Oversight Process (cROP) findings but instead a CO requirement intended to address SCWE issues, therefore the significance of this violation is subject to traditional enforcement as described in Section 2.2.4 of the NRC Enforcement Policy, dated January 15, 2020. Traditional enforcement violations are not assessed for cross-cutting aspects (OA5.1b).



**B. Licensee-Identified Violations**

None

## REPORT DETAILS

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a confirmatory order and safety conscious work environment follow up inspection at Vogtle Electric Generating Plant (VEGP) Units 3 and 4, in accordance with the Construction Reactor Oversight Process (cROP). The cROP is the NRC's program for overseeing the safe construction of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information.

### 4. OTHER ACTIVITIES

#### Cornerstone: Construction/Installation

#### Inspection Manual Chapter (IMC) 2504: Appendix A: Inspection of Construction Programs

##### **OA5.1** Inspection Procedure: (IP) 92702: Follow-Up on Traditional Enforcement Actions Including Violations, Deviations, Confirmatory Action Letters, and Orders

- 02.01 Documentation Review
- 02.02.a Corrective Actions

##### a. Inspection Scope

The inspectors reviewed commitments associated with four items from Confirmatory Orders (CO) Enforcement Action (EA)-18-130 and EA-18-171 (ADAMS Accession No. ML19249B612), issued to Southern Nuclear Company (SNC) Fleet Wide to include Farley, Hatch, Vogtle Units 1 and 2 (SNC-FW) and SNC Vogtle Units 3 and 4 (SNC-V) on November 20, 2019.

##### Employees Concern Program (ECP)

Commitment 1.a) This commitment and action required that SNC-FW maintain an Employee Concern Program (ECP) for plants authorized to operate (fleet-wide ECP) per SNC Policy 701, "Employee Concerns Program," revised February 2017. The inspectors verified by a review of corrective actions for Technical Evaluation (TE) 1058162 that the policy was revised on November 20, 2019, to reflect a statement aligned with the CO for SNC-FW. The inspection was completed for SNC-FW.

Commitment 1.b) This commitment and action required SNC-V to maintain the existing SNC Policy 701, One Project ECP for SNC-V, through commercial operation of each unit, or until such time that SNC determines transition to fleet-wide ECP is warranted. The inspectors verified by a review of corrective actions for TE 1058163 that the policy was revised on November 20, 2019, to reflect a statement aligned with the CO for SNC-V. The inspection was completed for SNC-V.

## Adverse Action Review Processes

Commitment 2.a) This commitment and action required SNC-FW and SNC-V to maintain a review process covering significant adverse actions (termination or suspension) taken by SNC with respect to SNC employees which requires consideration of protected activity, if any, prior to taking the significant adverse action. The inspectors verified by a review of corrective actions for TE 1058164 that the review process, SNC Safety Conscious Work Environment (SCWE) Review Standard was updated on November 20, 2019, to include significant adverse actions contingencies for SNC-FW and SNC-V. The inspection was completed for SNC-FW and SNC-V.

Commitment 2.b) This commitment and action required SNC-V to maintain a Discipline Review Process (DRP), applicable to SNC contractors or subcontractors (collectively "contractors") at the Vogtle Units 3 and 4 project site who are engaged in nuclear safety related work. Contractors must follow this process when termination is under consideration. This process also applies to SNC-V when (1) SNC-V requests removal of a contractor employee from the project site pursuant to contractual rights, and (2) when SNC-V releases from the project site a supplemental worker assigned to support SNC. The inspectors verified by a review of corrective actions for TE 1058165 that SNC-V had maintained and revised the DRP Standard applicable to SNC contractors and subcontractors on September 23, 2019. SNC-V sent their contractors and subcontractors (17 total) for the project site, the revised DRP Standard and updated purchase contracts that references the provisions of NRC whistleblower provisions as discussed in Section 211 of the Energy Reorganization Act of 1974 as amended, and 10 Code of Federal Regulation (CFR) 50.7 via electronic mail (email) dated October 16, 2019. The inspection was completed for SNC-V.

Commitment 2.c) This commitment and action required SNC-FW and SNC-V to develop contingencies in the event the results of the review process in 2.a or 2.b reveal a SCWE policy violation that is substantiated by the SNC Compliance and Concerns organization. SNC corrective actions arising from that violation, which may include discipline, will be tracked and confirmed as completed by the SNC Compliance and Concerns organization. The inspectors verified by a review of the corrective actions for TE 1058166 that the SNC SCWE policy included these contingencies in the revision dated November 20, 2019. The inspectors verified that the actions were completed for SNC - FW and SNC-V. The inspection was completed for SNC-FW and SNC-V.

## Training

Commitment 3.a): This commitment and action required within four (4) months of issuance of this confirmatory order, and until three (3) years thereafter, that SNC-FW and SNC-V will require all SNC employees who are onboarding to complete SCWE training, including training on 10 CFR 50.7, 10 CFR 52.5, 10 CFR 50.5, and 10 CFR 52.4, definition of adverse action as it appears in the RIS 2005-18, and acknowledge the SCWE policy within two (2) months of reporting to work. The inspectors verified by a review of corrective actions described in TE 1058167 that onboarding employees from the time period of March 2020 to December 2020 completed the SCWE training as described and that the SNC SCWE policy was acknowledged within the specified time. The inspector verified that these actions were completed for SNC-FW and SNC-V. The inspection was completed for SNC-FW. Although an inspection was performed for SNC-V, this section of the confirmatory order will remain open.

The NRC acknowledges the potential organizational strain that may exist during the transition to operations and the importance of a SCWE. As a result, the NRC will also review the corrective actions associated with the three-year requirement for SNC-V. This action is being tracked by the licensee under TE 1058167.

Commitment 3.b): This commitment and action required within four (4) months of issuance of this confirmatory order, that SNC-V will provide SCWE training to management at the project site to include SCWE lessons learned in the training materials. The management covered by this item includes both contractors' and SNC superintendents and managers, up to and including the project executive vice president, who are in those roles as of the date that is three (3) months after the issuance of this confirmatory order. Such training shall be developed by a third party with experience in the area of employee protection and shall include training on 10 CFR 50.7, 10 CFR 52.5, 10 CFR 50.5, and 10 CFR 52.4, the definition of adverse action as it appears in RIS 2005-18, and relevant case studies. The inspectors verified by a review of the corrective actions for TEs 1058168 and 1063699 that the SCWE training at the project site was presented by a third-party vendor and included lessons learned, applicable CFR references and definitions, and relevant case studies. Individuals that participated in the training were both contractors and SNC superintendents, managers, and the project executive vice president. The training was completed in March 2020. The inspection was completed for SNC-V.

Commitment 3.c): This commitment and action required that beginning no later than two (2) months of issuance of this confirmatory order, and until three (3) years thereafter, that SNC-FW and SNC-V will require all new SNC supervisors to receive SCWE training within six (6) months of their beginning work as a supervisor at SNC. For SNC-FW and SNC-V, the inspectors verified by a review of corrective actions for TEs 1064351 and 1058169 that all new SNC supervisors (~120) received the training as described in the CO. The inspection was only completed for SNC-FW. Although an inspection was performed for SNC-V, this section of the confirmatory order will remain open. The NRC acknowledges the potential organizational strain that may exist during the transition to operations and the importance of a SCWE. As a result, the NRC will also review the corrective actions associated with the three-year requirement for SNC-V. This action is being tracked by the licensee under TE 1058169.

Commitment 3.d): This commitment and action required that within six (6) months of issuance of this confirmatory order, SNC-FW and SNC-V will review and make appropriate revisions to include SCWE with its' construction and fleet General Employee Training (GET) program, or successor training, to ensure adequate coverage of 10 CFR 50.7, 10 CFR 52.5, 10 CFR 50.5, and 10 CFR 52.4. The inspectors verified by a review of corrective actions for TE 1058170 that revisions to SNC-FW and SNC-V GET program, or successor training, included SCWE and covered the following regulations 10 CFR 50.7, 10 CFR 52.5, 10 CFR 50.5, and 10 CFR 52.4. The inspection was completed for SNC-FW and SNC-V.

## Other Activities

Commitment 4.a): This commitment and action required within twelve (12) months of the issuance of this order, that SNC deliver a presentation to provide SCWE insights derived from the origins of the CO events to present at an appropriate industry-sharing forum (e.g., the NRC's Regulatory Information Conference, the National Association of Employee Concerns Professionals). The presentation shall be made available for NRC review. The inspectors verified by a review of corrective actions for TE 1058171 that a presentation by SNC was given at the Virtual ECP 2020 Fall Training Event from September 15 through September 17. The presentation had received prior NRC review. The inspection was completed for SNC.

Commitment 4.b): This commitment and action required within three (3) months of issuance of this confirmatory order, that SNC-FW will revise the SCWE policy to address lessons learned from these issues. The inspectors verified by a review of the corrective actions for TE 1058173 that SNC-FW revised the SCWE policy and developed the lessons learned from the issues identified by this CO. The inspectors verified that the revised policy was effective on October 22, 2018 and policy was revised Nov. 20, 2019. The inspector reviewed the actions as related to SNC-FW. The inspection was completed for SNC-FW.

Commitment 4.c): This commitment and action required within three (3) months of issuance of this confirmatory order, a senior SNC executive will issue a written communication to all SNC-FW employees and to contractors at the SNC-V project site reinforcing SNC's commitment to maintaining a SCWE and reaffirming SNC's insistence upon the protection of employees' rights and obligations to raise safety issues without fear of retaliation. SNC will mandate that SNC first line leaders and construction management (superintendents and above) inform their reports of the contents of the communication. The inspectors verified by a review of the corrective actions for TEs 1058174 and 1061792 that a written communication (letter dated January 27, 2020) was developed and shared with 6000 employees via a paystub insert. Inspectors also noted an email message to all employees dated January 29, 2020, to discuss the email with the direct reports. The inspection was completed for SNC-FW and SNC-V.

Commitment 4.d): This commitment and action required within six (6) months of issuance of this order that SNC-V will obtain a third-party, independent SCWE survey of Vogtle Units 3 and 4 project sites. SNC-V will obtain a second third-party, independent SCWE survey of SNC-V no later than thirty (30) months after issuance of this confirmatory order. The results of each survey will be summarized into reports which will be made available for inspection by NRC. Recommendations (if any) from the survey reports will be entered into the Corrective Action Program (CAP) or ECP, as appropriate, depending on the nature of the recommendation, for disposition. On April 12, 2020, SNC-V requested via email an extension to perform the independent SCWE survey in October 2020. (See ADAMS Accession No. ML20106F214). The extension was granted via a letter dated April 21, 2020, by the NRC Office of Enforcement (See ADAMS Accession No. ML20107J555). The inspectors verified by a review of the corrective actions for TEs 1058175 that the first independent SCWE survey for SNC-V was completed by a third-party vendor in October 2020.

The inspectors reviewed the corrective actions and enhancements associated with the independent SCWE survey to verify that corrective actions were developed and appropriate to address the challenges/weaknesses identified in the assessment. SNC-V continues to track the corrective actions through the following condition reports (CRs): 50066386, 50066388, 50066389. Although the inspection was completed for the first independent SCWE survey, this section of the confirmatory order will remain open because of requirement to perform a second independent SCWE survey for SNC-V within 30 months of issuance of the CO. This action is being tracked by the licensee under TE 1062345.

b. Findings

Introduction

The inspectors identified a Severity Level IV non-cited violation (NCV) for the licensee's failure to adequately implement requirements of Confirmatory Order (CO) EA-18-130 and EA-18-171 Commitment 3.a.

Description

Confirmatory Order EA-18-130 and EA-18-171, issued to SNC on November 20, 2019, requires, in part, that new SNC employees who are onboarding completed SCWE training, including training on 10 CFR 50.7, 10 CFR 52.5, 10 CFR 50.5, and 10 CFR 52.4, definition of adverse action as it appears in the RIS 2005-18, and acknowledge the SNC SCWE policy within two (2) months of reporting to work. On December 4, 2020, the inspectors identified two employees at Vogtle Units 3 and 4 who were hired into positions after March 20, 2020, but who did not complete the specified SCWE training within two months of their effective hire date.

Analysis

The inspectors determined this violation constituted a more than minor traditional enforcement violation associated with failure to implement the requirements of Confirmatory Order EA-18-130 and EA-18-171. A licensee's failure to ensure current and future confirmatory order requirements are met could potentially impact safety. Additionally, a failure to ensure new SNC employees completed SCWE training in a timely manner could cause missed opportunities to identify and/or prevent an environment where individuals would be hesitant to raise nuclear safety concerns for fear of retaliation. The inspectors determined that this violation was not associated with a Construction Reactor Oversight Process (cROP) findings but instead a CO requirement intended to address SCWE issues, therefore the significance of this violation is subject to traditional enforcement as described in Section 2.2.4 of the NRC Enforcement Policy, dated January 15, 2020. Traditional enforcement violations are not assessed for cross-cutting aspects. The licensee entered the issues described above into their corrective action program and took action to ensure that the two employees identified as having missed the requirement, had completed the training by December 14, 2020.

## Enforcement

Commitment 3.a of CO EA-18-130 and EA-18-171, issued to SNC on November 19, 2020, requires, in part, that: "SNC employees who are onboarding completed SCWE training, including training on 10 CFR 50.7, 10 CFR 52.5, 10 CFR 50.5, and 10 CFR 52.4, definition of adverse action as it appears in the RIS 2005-18, and acknowledge the SNC SCWE policy within two (2) months of reporting to work."

Contrary to the above, from March 20, 2020, to December 04, 2020, the licensee failed to ensure that new SNC employees, who are onboarding, completed SCWE training within two months of onboarding effective date. Specifically, two employees involved in nuclear related work activities, did not complete the SCWE training within two months as required. This violation is being treated as a non-cited violation, consistent with Section 2.3.2. of the Enforcement Policy, NCV 5200025/2020012-01 and 05200026/2020012-01, Failure to Adequately Implement Requirements of CO EA-18-130 and 18-171, Commitment 3.a. The NCV is opened and closed in this report. The licensee entered this issue into their CAP as CRs 50070704 and 50071376.

### **OA5.2** IP 93100 - Safety-Conscious Work Environment Issue of Concern Follow-Up

- 03.01 Allegations
- 03.02 Employees Concerns and Corrective Actions
- 03.03 Interviews and Focus Groups
- 03.03 Safety Culture Assessment

#### a. Inspection Scope

The inspectors performed a limited assessment of the SCWE at VEGP Units 3 and 4 in accordance with IP 93100, "Safety Conscious Work Environment Issue of Concern Follow-up," and other IPs as referenced by IP 93100. The objectives of the assessment were to: (1) to determine if indications of a chilled work environment exist at VEGP Units 3 and 4; (2) determine if employees are currently reluctant to raise safety or regulatory issues; and (3) determine if employees are currently being discouraged from raising safety or regulatory issues.

The inspectors conducted limited interviews with twenty-seven (27) SNC employees, contractors, and management. Individuals were randomly selected for the interviews from the day and night shifts roster. The inspectors sampled a majority of the individuals from the licensee's contractor, Bechtel, in the electrical and instrument and control (I&C) quality control departments. Based on the results of the limited interviews, safety culture surveys, and assessments, the team found no evidence of a chilled work environment; no reluctance by the majority of individuals to raise safety or regulatory issues outside of their immediate management; nor were individuals being discouraged from raising safety or regulatory issues.

Interviewees were asked a series of questions in a semi-structured interview format. Follow-up questions were asked as necessary to facilitate a full understanding of employees' perceptions of the work environment. Questions included:

**Nonsupervisory/Managers Questions:**

- Do you feel like your department encourages people to raise nuclear, radiological, or regulatory safety concerns (including challenging actions or decisions believed to be unsafe)?
- Do you feel like you can raise nuclear or regulatory safety concerns safety concerns without fear of retaliation?
- Are you aware of any instance where someone experienced a negative reaction from a supervisor or manager for raising a nuclear or regulatory safety issue?
- Do you believe other employees may be hesitant to raise nuclear regulatory safety concerns? Why? What would make them hesitant?
- Do you believe management is aware of these issues? Have actions been taken to address the situation?
- If you did not feel comfortable using your chain of command, are there other avenues you would use to raise a nuclear safety concern?
- In the past six months, has the environment in your department gotten better, worse, stayed the same?
- How do you feel about using the Corrective Action Program? Is it effective?
- Would you feel comfortable using the ECP if you had a nuclear safety concern?
- Do you consider ECP to be a viable alternate path that provides for evaluation, resolution, and feedback regarding concerns?
- Do you feel like the ECP structure provides independence from management?

**Supervisory/Managers Questions:**

- Do you feel like your department encourages people to raise issues that can affect nuclear safety? Other types of safety issues?
- Do you feel like staff can raise nuclear and/or regulatory safety concerns without fear of retaliation?
- Do you believe that raising a nuclear safety concern might negatively affect their job?
- Do you believe employees may be hesitant to raise nuclear or radiological safety concerns? If yes, why?
- Are the staff able to challenge an action or decision if they believe it is unsafe or a violation of safety regulations?
- What do you expect your current management's response would be if they were aware of someone being retaliated against for raising a safety concern or a department that wasn't supporting employees to raise concerns? Why?
- Do you encourage your staff to write a CR if they identify a nuclear safety issue? Do you give them feedback about how the issue was resolved when they write a CR?



- Have events or circumstances occurred in the past year that have reduced:
  - a. Staff willingness to identify or raise safety issues?
  - b. Staff confidence in the Corrective Action Program?
  - c. Staff willingness to challenge actions or decisions they believe are unsafe?

Based on the team's interviews, all individuals expressed that they are willing to raise nuclear safety concerns, but there was a small percentage of individuals who would feel hesitant to raise concerns beyond their immediate supervision due to fear of retaliation. However, the individuals interviewed were willing to raise nuclear safety concerns through at least one (ECP, labor relations, NRC) alternative method. These individuals' hesitance was primarily based on past behaviors at the site and not necessarily current behaviors. Inspectors determined that these departments face some challenges in the area of SCWE as it transitions from construction to operations. The following areas were identified and observed by the inspectors as opportunities for improvement:

- There was a perception by some craft personnel that production and schedule was taking priority over quality and safety and it was incumbent on the craft to identify and elevate issues as the schedule milestones get closer to commercial status. The licensee entered the issue into their CAP under CR 50071641. NRC staff will continue to monitor the health of SCWE at the site through normal baseline inspections and the allegations program. The licensee entered the issue into their CAP under CR 50071641.
- There was a lack of understanding by some personnel of the resolution of condition reports in the CAP. Understanding and resolving existing gaps in the Bechtel QC (Electrical/I&C) departments with respect to the knowledge and usage of CAP and ECP will increase transparency and clarity on the resolution of condition reports. The licensee entered the issue into the CAP under CR 50071287.
- There was a lack of awareness of the site ECP as an alternate avenue to raise nuclear and industrial safety concerns outside of the immediate management. Both the ECP and CAP programs are critical for a healthy safety conscious work environment and especially important as SNC approaches commercial operation with respect to their self-identification of potential issues that may affect an Inspection Testing Analysis Acceptance Criteria (ITAAC). The licensee entered the issue into the CAP under CR 50071286.

The inspectors also reviewed ECP case files and assessments (program self-assessments and work environment assessments), meeting minutes from the Nuclear Safety Culture Monitoring Panel (NSCMP), Site Leadership Team meetings, and condition reports and corrective actions associated with safety culture and SCWE. Based on the results of interviews, safety culture surveys, and assessments, the team determined that the licensee continues to make efforts in improving the safety conscious work environment at the site as a result of the corrective actions from the CO EA-18-130 and EA-18-171.

For example, ECP has conducted several SCWE training initiatives with site contractors and SNC employees. From interviews of ECP staff, inspectors determined that the NSCMP had individual contributors from various disciplines that rotate on the panel for a year. These individuals provide an additional technical resource for the panel.

In addition, senior management has attempted to prioritize SCWE as evidenced from site wide communications that discussed senior management commitments to improve SCWE. The communication was sent out to over six thousand employees in the fourth quarter of last year. Among the most positive responses were in the area of personal accountability and questioning attitude by interviewees on work processes. These responses were consistent with the licensee's independent third-party safety culture assessment which was conducted in response to the CO. The team reviewed the licensee's third-party safety culture assessment results and concluded that it was a thorough assessment and provided the necessary information for the site to develop adequate corrective actions. The inspection team determined that VEGP Units 3 and 4 project site continued to make progress with improving their safety conscious work environment.

b. Findings

None

**OA6 Meetings, Including Exit**

The inspectors verified no proprietary information was retained or documented in this report. On December 11, 2020, the inspectors presented the confirmatory order and safety conscious work environment follow up inspection results to Mr. Glen Chick, SNC Executive Vice President for Units 3 and 4, and other members of the licensee staff.

**SUPPLEMENTAL INFORMATION**

**KEY POINTS OF CONTACT**

Licensees and Contractor Personnel

G. Chick, SNC Executive Vice President for Vogtle Units 3 and 4  
L. Grissom, SNC Fleet Compliance Engineer  
S. Leighty SNC Licensing Supervisor  
N. Kellenberger SNC Licensing Supervisor  
J. March, SNC Compliance and Concerns Director  
K. Phelps, SNC Concerns Program Manager  
L. Pritchett, SNC Licensing Engineer  
K. Roberts, SNC Licensing Manager  
G. Stallings, SNC Program Manager Nuclear Safety  
A. Tyson, SNC ECP Supervisor

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

<u>Item Number</u>	<u>Type</u>	<u>Status</u>	<u>Description</u>
EA-18-171/EA-18-130	CO	Closed	Commitments 1a, 2a, 2c, 3a, 3c, 3d, 4a, 4b, and 4c for Farley, Hatch, Vogtle Units 1& 2
EA-18-171/EA-18-130	CO	Closed	Commitments 1b, 2a, 2b, 2c, 3b, 3d, 4a, 4c, for Vogtle Units 3 and 4
EA-18-171/EA-18-130	CO	Discussed	Commitments 3a, 3c and 4d for Vogtle Units 3 and 4
05200025/2020012-01	NCV	Open/Closed	Failure to Adequately Implement Requirements of CO EA-18-130 and 18-171, Commitment 3.a).
05200026/2020012-01	NCV	Open/Closed	Failure to Adequately Implement Requirements of CO EA-18-130 and 18-171, Commitment 3.a).

## LIST OF DOCUMENTS REVIEWED

### Corrective Action Documents

#### Technical Evaluation

1058162  
1058163  
1058164  
1058165  
1058166  
1058167  
1058168  
1058170  
1058171  
1058173  
1058174  
1058175  
1064351  
1058169  
1058174  
1058176  
1062345  
1063699  
1061792

#### Corrective Action Record

277078

#### Condition Report

10666283  
62020001332  
2019005087  
2020001332  
2020002677

#### NRC-Condition Reports

50070704  
50071376  
50066386  
50035164  
50071286  
50071287  
50071641  
50035164

#### Procedures

ND-AD-002, Corrective Action Program, Revision (Rev.) 30  
ND-AD-002-025, Issue Identification and Condition Report Screening, Rev 3  
ND-AD-002-026, Corrective Action Program Processing, Rev 3  
ND-AD-600, Nuclear Development Cause Analysis, Rev. 15

ND-AD-006-001, Cause Analysis and Corrective Action Guideline, Rev. 7  
NMP-GM-02-001, Corrective Action Program Instructions, Rev.40  
ND-LI-012, NRC Posting Requirements, Rev.7  
ND-AD-VNP-004, Construction Experience Program, Rev 12.1  
NMP-GM-003, Self-Assessments and Benchmark, Rev.28  
ND-AD-014, Nuclear Safety Culture Monitoring, Rev 4  
SNC Policy 701, Employee Concerns Program dated 11/20/2019

Miscellaneous

SNC Policy 762, Safety Conscious Work Environment Policy dated 11/20/19  
Discipline Review Process (DRP) dated 4/14/2020  
Nuclear Safety Culture Survey, 9/29/2020  
2019005087, Bechtel Work Environmental Assessments/  
Nuclear Safety Culture Performance Rating and SLT Report dated 8/7/10  
Nuclear Safety Culture Performance Rating and SLT Report dated 10/30/19  
Nuclear Safety Culture Performance Rating and SLT Report dated 1/29/20  
Nuclear Safety Culture Performance Rating and SLT Report dated 5/13/20  
Nuclear Safety Culture Performance Rating and SLT Report dated 8/26/20  
Quality Assurance Interface Document-Vogtle Units 3 and 4, SNC and Bechtel, Rev 2  
COMTA Status dated 12/2/2020  
ECP Brochure (English) dated September 2020  
ECP Poster dated August 2020

## LIST OF ACRONYMS

CAP	Corrective Action Program
CFR	Code of Federal Regulation
CO	Confirmatory Order
CR	Condition Report
cROP	Construction Reactor Oversight Process
DRP	Discipline Review Board
EA	Enforcement Action
ECP	Employees Concern Program
GET	General Employee Training
VEGP	Vogtle Electric Generating Plant
I&C	Instrument and Control
IMC	Inspection Manual Chapter
IP	Inspection Procedure
IR	Inspection Report
ITAAC	Inspection Testing Analysis Acceptance Criteria
NCV	Non-Cited Violation
NRC	Nuclear Regulatory Commission
NSCMP	Nuclear Safety Culture Monitoring Panel
RIS	Regulatory Issue Summary
SCWE	Safety Conscious Work Environment
SL	Severity Level
SNC	Southern Nuclear Company
SNC-FW	Southern Nuclear Company- Hatch, Farley, Vogtle Units 1 and 2
SNC-V	Southern Nuclear Company -Vogtle Units 3 and 4
TE	Technical Evaluation