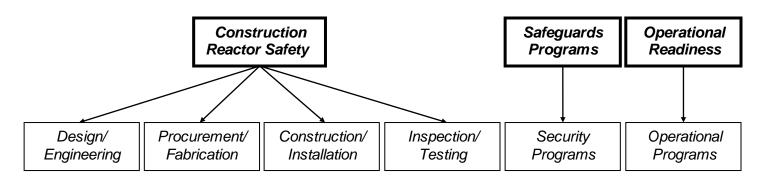
V.C. Summer Unit 3 1Q/2017 Performance Summary

Construction Action Matrix Column:

Licensee Response



Most Significant Inspection Findings

1Q/2017	No findings this quarter	<u>G</u>	No findings this quarter	No findings this quarter	No findings this quarter	No findings this quarter
4Q/2016	<u>G</u>	No findings this quarter	No findings this quarter	No findings this quarter	No findings this quarter	No findings this quarter
3Q/2016	No findings this quarter	No findings this quarter	No findings this quarter	No findings this quarter	No findings this quarter	No findings this quarter
2Q/2016	No findings	No findings this quarter	No findings this quarter	<u>G</u>	No findings this quarter	No findings this quarter

Additional Inspection and Assessment Information -

- List of Construction Inspection Reports
- <u>List of Construction Assessment</u>
 <u>Reports/Inspection Plans</u>
- **❖ V.C. Summer Unit 3 Findings Archive**

Design Engineering

Identified By: NRC

Identification Date: 12/31/2016

Significance: Green **Item Type:** ITAAC Finding

Failure to Properly Translate Design Requirements

The inspectors identified an ITAAC finding of very low safety significance (Green) and associated noncited violation (NCV) of Title 10 of the Code of Federal Regulations (10 CFR) Part 50, Appendix B, Criterion III, "Design Control" for South Carolina Electric & Gas Company's (SCE&G) failure through their contractor Westinghouse Electric Company (WEC) to adequately implement measures to assure that design inputs are correctly translated into design documents. The licensee entered this finding into their corrective action program as SCE&G Condition Report (CR) CR-NND-16-01990 and WEC Corrective Action, Prevention, and Learning (CAPAL) System Issue ID 100423100.

The finding was associated with the Design/Engineering Cornerstone. 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 structure, system, or component (SSC) indeterminate. 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 licensee was able to demonstrate with reasonable assurance that the design function of the in-containment refueling water storage tank (IRWST) would not be impaired. The inspectors determined that the finding represented an ITAAC finding because it was material to the acceptance criteria of VCSNS Units 2 and 3 ITAAC 760, 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 implement measures to assure that design inputs are correctly translated into design documents may have resulted in a deviation from the approved design that would not have been reconciled by the licensee. The inspectors determined the finding had a cross-cutting aspect in the Human Performance area because the detailed design documentation for the CA03 module did not provide evidence that the design was performed in accordance with quality assurance requirements, and that the IRWST would have performed satisfactorily in service. [H.7] (Section 1A18)

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Procurement/Fabrication

Identified By: NRC

Identification Date: 03/31/2017

Significance: Green **Item Type:** ITAAC Finding

Failure to generate adequate instructions and procedures to control the fabrication of safety-related parts in an on-site machine shop

<u>Green:</u> The inspectors identified a construction finding of very low safety significance (Green) and associated non-cited violation (NCV) of Title 10 of the Code of Federal Regulations (10 CFR) Part 50, Appendix B, Criterion V, "Instructions, Procedures and Drawings", for South Carolina Electric & Gas Company's (SCE&G) failure through their contractor Westinghouse Electric Company (WEC) to generate adequate instructions and procedures to control the fabrication of safety-related parts in an on-site machine shop. The licensee stopped work in the machine shop until the work package was updated with

steps to define the scope of work, including inspection hold points. All parts were inspected for compliance before being installed. The licensee entered this finding into their corrective action program as SCE&G CR-NND-17- 30375 and WEC CAPAL System Issue DI 100455172.

The finding was associated with the Procurement/Fabrication Cornerstone. The finding was considered more than minor because there was a substantive failure to establish an adequate procedure or quality oversight function to ensure safety-related parts were being fabricated in accordance with design requirements. The inspectors evaluated the finding in accordance with Appendix A, of IMC 2519, "AP1000 Construction Significance Determination Process." The inspectors determined the finding was of very low safety significance (GREEN) because at the time of discovery, the installation of the rebar connection plate to the electrical penetration assembly had not yet been completed, nor had any EPAs been installed into the shield building wall. This finding was assigned a cross-cutting aspect in accordance with IMC 0613 Appendix F, "Construction Cross-Cutting Areas and Aspects," in the area of Human Performance, Work Management. [H.5] The inspectors determined that the most significant causal factor of the performance deficiency was due to a lack of work controls established in the machine shop.

(Section 1P03)

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Construction/Installation

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Inspection/Testing

Identified By: NRC

Identification Date: 06/30/2016

Significance: Green **Item Type:** ITAAC Finding

Excessive Reinforcement on Unit 3 CA20 Welds

The inspectors identified an ITAAC finding of very low safety significance (Green) and associated NCV of 10 CFR Part 50, Appendix B, Criterion X, "Inspection," for SCE&G's failure, through their contractor WEC, to identify nonconforming welds on a safety-related structure as required per quality control inspection plans. Section 3.8.3.2 of the Updated Final Safety Analysis Report (UFSAR) requires compliance with American Welding Society (AWS) D1.1:2000. The inspections were required by a contractor's quality control (QC) inspection plan F-S561-007, "AWS D1.1 – Visual Weld Inspection - Carbon Steel." The licensee entered this issue into their corrective action program as CR-NND-16-00854.

The finding was associated with the Inspection/Testing cornerstone. The inspectors determined the performance deficiency was more than minor following the guidance in IMC 0613, "Power Rector Construction Inspection Reports," Appendix E, because the issue represented a substantive failure to implement an adequate quality oversight function. Specifically, a visual welding inspection of a safety-related structure failed to identify nonconforming welds. The inspectors evaluated the finding using the construction significance determination process and determined the finding was of very low safety significance (Green) because there was reasonable assurance that the CA20 module would have been able to meet its design function. The finding was determined to be an ITAAC finding because it was material to the acceptance criteria of Unit 3 ITAAC 763 (3.3.00.02a.i.d). The acceptance criteria of this ITAAC requires the as-built structures in the radiologically controlled area of the auxiliary building, including the critical sections, conform to the approved design and withstand the design basis loads specified in the Design Description without loss of structural integrity or the safety-related functions. This finding is associated with deviations from design requirements that would not have been reconciled by the licensee as required by the ITAAC. The inspectors screened the finding for a possible construction crosscutting aspect in accordance with Appendix F, "Construction Cross-Cutting Components and Aspects" of

IMC 0613. This finding has a cross-cutting aspect in the area of Human Performance, because the licensee's contractor failed to identify nonconforming welds when performing an inspection using a contractor's QC inspection plan F-S561-007, "AWS D1.1 – Visual Weld Inspection - Carbon Steel." [H.8]

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