



2Q/2017	G	No findings this quarter	No findings this quarter	No findings this quarter	No findings this quarter	No findings this quarte
1Q/2017	No findings this quarter	No findings this quarter	No findings this quarter	G	No findings this quarter	No findings this quarter

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Design Engineering

Identified By: NRC Identification Date: 12/31/2017 Significance: Green Item Type: ITAAC Finding

The NRC identified an ITAAC finding of very low safety significance (Green) and associated NCV of 10 CFR Part 50.55a(b), for the licensee's failure to demonstrate compliance with American Society of Mechanical Engineers (ASME) Code Section III, 1998 Edition with Addenda 1999 through 2000, Section NB-3222.2, "Primary Plus Secondary Stress Intensity." The inspectors identified that the licensee failed to ensure that the maximum range of stress intensities for the passive residual removal heat exchanger (PRHR HX) tube sheet and the core makeup tank (CMT) inlet nozzle were within ASME Code allowable limits for Service Level A/B conditions which was a performance deficiency. The licensee entered this finding into their corrective action program (CAP) as Condition Report (CR) 10402072, CR 10402069, CR 10454090, Corrective Action Prevention and Learnings (CAPAL) 100489810, and CAPAL 100489811 and took corrective actions to perform additional analyses after removing calculation conservatism to reevaluate the stress cut locations in question in order to show ASME Code compliance.

The finding was determined to be more than minor because the performance deficiency represented an adverse condition that rendered the quality of components indeterminate, and required substantive corrective action. The inspectors determined this finding was associated with the Design/Engineering Cornerstone. Using IMC 2519, Appendix A, "AP1000 Construction Significance Determination Process," the inspectors determined that the finding was associated with a system or structure; it was associated with the Passive Core Cooling System (PXS) system which is assigned to the high risk importance column of the AP1000 Construction Significance Determination Matrix, and the licensee was able to demonstrate with reasonable assurance that the design function of the applicable structure or system would not be impaired by the deficiency. Therefore, this finding was of very low safety significance (Green). The inspectors determined the finding was indicative of present licensee performance and was associated with the cross-cutting aspect of Conservative Bias, H.14, in the area of Human Performance, in accordance with IMC 0613, Appendix F, "Construction Cross-Cutting Areas and Aspects." (1A11, 1A38)

Identified By: NRC Identification Date: 06/30/2017 Significance: Green Item Type: ITAAC Finding

The NRC identified an ITAAC finding of very low safety significance (Green) and associated NCV of Title 10 of the Code of Federal Regulations (10 CFR) Part 50, Appendix B, Criterion III, "Design Control" for the licensee's failure through their contractor Westinghouse Electric Company (WEC) to perform thermal stress analysis in the ASME design report for the shear cap and valve body of the 14-inch fourth-stage automatic depressurization system (ADS) squib valves, RCS-PL-V004A/B/C/D. The licensee entered this finding into their corrective action program as Condition Reports (CR) 10379762 and 10389193 and WEC Corrective Action, Prevention and Learning (CAPAL) 100478099 and 100481984. The licensee performed immediate corrective actions to demonstrate with reasonable assurance through design analysis that the component would have been able to meet its design function. Additional long-term corrective actions include performance of additional analysis and revisions to the ASME design report and supporting documentation.

The inspectors determined this finding was associated with the Design/Engineering Cornerstone. The finding was determined to be more than minor because the performance deficiency represented an adverse condition that rendered the quality of component indeterminate, and required substantive corrective action. The inspectors also determined that the finding was more than minor because it represented an ITAAC finding that was material to the acceptance criteria of VEGP Unit 3 and 4 ITAAC

13 (2.1.02.02a), and if left uncorrected, the licensee may not have been able to demonstrate that the acceptance criteria of this ITAAC was met. The inspectors evaluated the finding in accordance with IMC 2519, Appendix A, "AP1000 Construction Significance Determination Process," and determined the finding was of very low safety significance (Green) because it was associated with the RCS system which is assigned to the high risk importance column of the AP1000 Construction Significance Determination Matrix, and the licensee was able to demonstrate with reasonable assurance that the design function of the applicable structure or system would not be impaired by the deficiency. The inspectors determined the finding was indicative of present licensee performance and was associated with the cross-cutting aspect of Documentation, in the area of Human Performance, in accordance with IMC 0613, Appendix F, "Construction Cross-Cutting Areas and Aspects." Specifically, the licensee failed to maintain complete, accurate, and up-to-date design documentation for the 14-inch ADS squib valves [H.7]. (Section 1A01)

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Inspection/Testing

Identified By: NRC Identification Date: 03/31/2017 Significance: Green Item Type: ITAAC Finding

Failure to Identify Nonconforming Welds.

<u>Green:</u> The inspectors identified an ITAAC finding of very low safety significance (Green) and associated NCV of 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," for the licensee's failure to identify nonconforming welds between seismic category I structural modules associated with the Unit 4 In-Containment Refueling Water Storage Tank steel wall (IRWST) – module CA03. Specifically, the license failed to identify that welds 880718-A12 and 880717- A09 were nonconforming to section 5.11.5 of American Welding Society (AWS) Code D1.6:1999, in that these welds contained multiple locations of weld reinforcement that exceeded 1/8 inch and did not have a gradual transition to the plane of the base metal surface. The licensee entered this finding in their corrective action program as Corrective Action, Prevention and Learning (CAPAL) 100451345, Nonconformance and Disposition Report (N&D) SV4-CA03- GNR-000049, and SV4-CA03-GNR-000050. The licensee reworked the welds and restored compliance with the approved design.

The inspectors determined the performance deficiency was more than minor because Question 3 provided in IMC 0613, Appendix E was answered "Yes." Specifically, the inspectors considered the rework required to restore welds 880718-A12 and 880717-A09 to design requirements, to be substantive, based on the linear feet of nonconforming weld and because the rework invalidated the surface examinations that had already been performed... Using Appendix A, "AP1000 Construction Significance Determination Process," of IMC 2519, "Construction Significance Determination Process," the inspectors concluded this finding was of very low safety significance (Green) because the licensee demonstrated with reasonable assurance that the design function of the IRWST steel wall would not be impaired by the deficiency (Step 9 of Appendix A). This finding was cross-cutting in the area of Problem Identification and Resolution, Identification, because individuals did not identify issues completely, accurately, and in a timely manner in accordance with the corrective action program. [P.1] (Section 1A34)

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Operational Programs

Identified By: NRC Identification Date: 12/31/2017 Significance: Green Item Type: Construction Finding

The inspectors identified an NCV of Technical Specification (TS) 5.5.1 of very low safety significance for the licensee's failure to include accurate parameters in the ODCM for the calculation of offsite radiation doses due to routine gaseous effluent releases. Specifically, the ODCM contained long-term atmospheric dispersion factors that were less conservative than those used in the Updated Final Safety Analysis Report (UFSAR) and Early Site Permit to demonstrate compliance with 10 CFR 20 and 10 CFR 50, Appendix I. The licensee documented this issue in CR 10437502 and has planned corrective actions including re-evaluation of the dispersion values contained in the ODCM by an independent subject matter expert.

The finding was of more than minor significance because it was associated with the Operational Readiness Cornerstone, Program Effectiveness Attribute of Process and Effluent Monitoring, and adversely affected the associated cornerstone objective to ensure licensees adequately develop and implement the operational programs required by a license condition or regulation. The finding has a cross-cutting aspect in the area of Human Performance, Conservative Bias [H.14], because the dispersion parameters incorporated into the ODCM were less conservative than the ones used in the approved licensing basis documents. (3P02)

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