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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 Process, 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)

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**Procurement/Fabrication** 

Identified By: NRC Identification Date: 06/30/2018 Significance: Green Item Type: ITAAC Finding Report: Vogtle Electric Generating Plant, Units 3 And 4 - NRC Integrated Inspection Reports 05200025/2018002, 05200026/2018002 Item Number: 05200025/2018002-01 Note: Closed in Report (NCV)

## Missing Weld Edge Preparation Surface Examination on Pressurizer Lower Head

(Green) 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 50.55a(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, Subarticle NB-5130, Examination of Weld Edge Preparation Surfaces. The inspectors identified that the licensee failed to document a magnetic particle (MT) or liquid penetrant (PT) examination on the full penetration weld edge preparation surface of the Unit 3 pressurizer lower head which was a performance deficiency. The licensee entered this finding into their corrective action program as condition report (CR) 10484251 and took corrective actions to provide reasonable

assurance that a PT examination was performed by the vendor to show ASME Code compliance.

The finding was determined to be more than minor because the performance deficiency represented an irretrievable loss or inadequate documentation of a quality assurance record, and a record-keeping issue that could preclude the licensee from demonstrating the adequacy of quality or from properly evaluating safety-significant activities. The inspectors determined this finding was associated with the Procurement/Fabrication Cornerstone and was not associated with a security finding; it was not associated with an IMC 2504 operational/construction program: and it was not associated with a repetitive, NRC-identified omission of a program critical attribute. 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 Reactor Coolant System (RCS) 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 (row 1 of the Construction Significance Determination Matrix). 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 Documentation, H.7, in the area of Human Performance, in accordance with IMC 0613, Appendix F, Construction Cross-Cutting Areas and Aspects. (1A01)

Identified By: NRC Identification Date: 06/30/2018 Significance: Green Item Type: ITAAC Finding Report: Vogtle Electric Generating Plant, Units 3 And 4 - NRC Integrated Inspection Reports 05200025/2018002, 05200026/2018002 Item Number: 05200025/2018002-02 Note: Closed in Report (NCV)

## Failure to Meet Radiographic Film Requirements on PRHR HX

(Green) 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 ASME Code Section III, 1998 Edition with Addenda 1999 through 2000, Subarticle NB-5100, General Requirements for Examination. The inspectors identified that the licensee failed to ensure that radiographic films for the passive residual heat removal (PRHR) heat exchanger (HX) lower channel head to lower support plate weld (CW-006/2) met density limitations and image quality indicator (IQI) placement requirements which was a performance deficiency. The licensee entered this finding into their corrective action program as CR 10491047 and took corrective actions to perform additional radiographs 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 a component indeterminate, and required substantive corrective action. The inspectors determined this finding was associated with the Procurement/Fabrication Cornerstone and was not associated with a security finding; it was not associated with an IMC 2504 operational/construction program; and it was not associated with a repetitive, NRC-identified omission of a program critical attribute. 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) which is assigned to the intermediate 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 (row 1 of the Construction Significance Determination Matrix). 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 Evaluation, P.2, in the area of Problem

Identification and Resolution, in accordance with IMC 0613, Appendix F, Construction Cross-Cutting Areas and Aspects. (1A15)

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

The inspectors identified a construction finding of very low safety significance (Green) 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 representative of current meteorological conditions and less conservative than those used in the UFSAR and ESP 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). The finding is not greater than Green because the finding is not an omission of the ODCM's critical attributes.

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