

Additional Inspection and Assessment Information

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## **Design Engineering**

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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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