



Additional Inspection and Assessment Information

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Procurement/Fabrication

Identified By: NRC Identification Date: 12/31/2019 Significance: Green Item Type: ITAAC Finding Report: Vogtle Electric Generating Plant, Units 3 And 4 - NRC Integrated Inspection Reports 05200025/2019004, 05200026/2019004 Item Number: 05200025/2019004-02 Note: Closed in Report (NCV)

Non-Conservative Rounding of Conversion Factor Use

The inspectors identified an ITAAC finding of very low safety significance with an associated NCV of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for the licensee's failure to install Unit 3 core makeup tank (CMT) A upper level sensing lines for instruments PXS 11A/C and 13 B/D in accordance with ITAAC 2.2.03.08c.xii and the approved design requirements. The licensee entered this finding into its corrective action program for evaluation and identification of appropriate corrective actions (CR50034981). Corrective actions for this issue included rework on the two-level sensing lines to correct the nonconforming conditions.

The performance deficiency was of more than minor safety significance, and thus a finding, because it was material to the acceptance criteria of an ITAAC and invalidated the Inspection, Test, or Analysis described in the ITAAC. The inspectors determined this finding was not associated with a security program; 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. The inspectors determined this finding was a performance deficiency of very low safety significance (Green) because if left uncorrected, the finding could reasonably be expected to impair the design function of only one train of a multi-train system. The inspectors determined the finding was indicative of present licensee performance and was associated with the cross-cutting aspect of Avoiding Complacency, in the area of Human Performance, in accordance with Appendix F of IMC 0613. Specifically, the licensee failed to properly implement appropriate error reduction tools, such as inadequate verification by personnel performing the measurements. [H.12] (Section 1A07)

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Construction/Installation

Identified By: NRC Identification Date: 12/31/2019 Significance: Green Item Type: ITAAC Finding Report: Vogtle Electric Generating Plant, Units 3 And 4 - NRC Integrated Inspection Reports 05200025/2019004, 05200026/2019004 Item Number: 05200025/2019004-01 Note: Closed in Report (NCV)

Failure to Meet ITAAC Requirement for Installation

The inspectors identified an ITAAC finding of very low safety significance (Green) with an associated NCV of 10 Code of Federal Regulations (CFR) Part 50, Appendix B, Criterion IV, "Procurement Document Control," for the licensee's failure to specify an accurate conversion factor for calculating the dry film density of coatings used in containment. Specifically, the licensee used a conversion factor that was rounded in a non-conservative manner, which resulted in the dry film density not meeting the ITAAC. The licensee entered this issue into its corrective action program as CR 50034350 and CR 50034649. The licensee performed immediate corrective actions to demonstrate with reasonable assurance the non-conforming coatings with a dry film density of 99.83 pounds per cubic feet (lbs/ft3) would not transport to the containment sump screens and the design function of the PXS would not be impaired.

The performance deficiency was of more than minor safety significance, and thus a finding, because it was material to the acceptance criteria of an ITAAC. The inspectors determined this finding was not associated with a security program; it was not associated with an IMC 2504 operational or construction program; and it was not associated with a repetitive, NRC-identified omission of a program critical attribute. The inspectors determined this finding was of very low safety significance (Green) because 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 Conservative Bias, in the area of Human Performance. Specifically, the licensee failed to use decision making practices that emphasized prudent choices over those that are simply allowable when rounding off conversion factors in specifications, and when receiving coatings that were within less than 0.25% of the acceptance criterion. [H.14] (Section 1A06)

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Security Programs

Identified By: NRC Identification Date: 03/31/2019 Significance: Severity Level IV Item Type: Enforcement Report: Vogtle Electric Generating Plant, Units 3 And 4 - NRC Integrated Inspection Reports 05200025/2019001, 05200026/2019001 Item Number: 05200025/2019001-02 Note: Closed in Report (NCV)

Failure to Implement FFD Requirements

(Severity Level IV) The NRC identified a Severity Level IV NCV as a result of a NRC Office of Investigation (OI Report 2-2017-026) report for the licensee's failure to adequately implement the Fitness For Duty (FFD) testing program. Specifically, a FFD collector working at Vogtle Units 3 and 4 failed to ensure a donor emptied their pockets of all contents before collection of a sample. This failure allowed the donor to subvert a FFD test as required by 10 CFR 26.105(b). The licensee entered this finding into their corrective action program as CR 10366889 and subsequently re-tested all the individuals which were tested on May 8, 2017, by the FFD collector in question. All re-tested individuals passed. The FFD collector and the individual that subverted the FFD test were both removed from the site.

The finding was determined to be more than minor because the issue represented a failure of the licensee to appropriately implement the requirements of 10 CFR 26.105(b) and 10 CFR 26.85(a). Although this violation is willful, it was brought to the NRC's attention by the licensee, it involved isolated acts of low-level individuals, and it was addressed by appropriate remedial actions. The security

significance of this violation was determined to be a Severity Level IV, in part, because there were no adverse security impacts to the construction facility, and the individual was precluded from entering the Construction Controlled Area. Violations that involve willfulness or that affect the regulatory process are dispositioned using traditional enforcement and are not subject to IMC 2519, "Construction Significance Determination Process." Traditional enforcement violations are not assessed for cross-cutting aspects. (2P01)

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