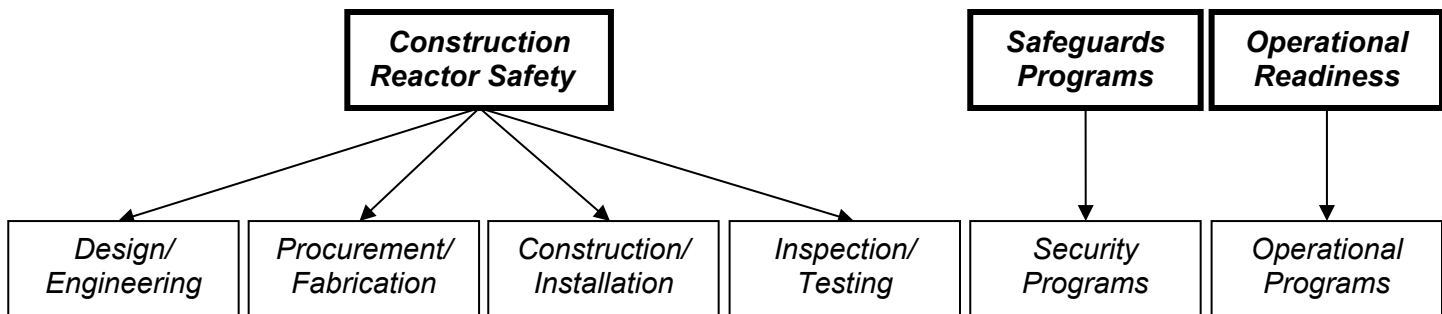


## Vogtle Unit 4 4Q/2019 Performance Summary

[Construction Action Matrix Column:](#)  
[Licensee Response](#)



### Most Significant Inspection Findings

4Q/2019	No findings this quarter	No findings this quarter	<a href="#">G</a>	No findings this quarter	No findings this quarter	No findings this quarter
3Q/2019	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/2019	No findings this quarter	No findings this quarter	No findings this quarter	No findings this quarter	No findings this quarter	No findings this quarter
1Q/2019	No findings this quarter	<a href="#">G</a>	No findings this quarter	No findings this quarter	<a href="#">Severity Level IV</a>	No findings this quarter

### Additional Inspection and Assessment Information

- ❖ [List of Construction Inspection Reports](#)
- ❖ [List of Construction Assessment Reports/Inspection Plans](#)
- ❖ [Vogtle Unit 4 Findings Archive](#)

## Design Engineering

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## Procurement/Fabrication

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**Identified By:** NRC

**Identification Date:** 03/31/2019

**Significance:** Green

**Item Type:** ITAAC Finding

**Report:** Vogtle Electric Generating Plant, Units 3 And 4 - NRC Integrated Inspection Reports 05200025/2019001, 05200026/2019001

**Item Number:** 05200026/2019001-01

**Note:** Closed in Report (NCV)

### Failure to Identify Nonconforming Radiographic Film

The NRC identified an ITAAC finding of very low safety significance (Green) and associated NCV of Title 10 of the Code of Federal Regulations, Part 50, Appendix B, Criterion XVI, Corrective Action, for the licensee's failure to identify nonconforming radiograph films for the Unit 4 core makeup tank (CMT) B. The licensee failed to identify that density variations for radiograph film sections 8-9 and 14-15 for the CMT B manway to shell weld (CW-035) were nonconforming to ASME Code, Section III, 1998 Edition including 2000 Addenda, Sub-article NB-5100, General Requirements for Examination. The licensee entered this finding into their corrective action program as condition reports (CRs) 50010045 and 50010650 and subsequently performed additional radiographs in order to provide reasonable assurance of 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 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. Using IMC 2519, Appendix A, AP1000 Construction Significance Determination Process, the inspectors determined that the finding was associated with a system; i.e. the passive core cooling system (PXS), which is assigned to the intermediate risk importance column of the AP1000 Construction Significance Determination Matrix. The licensee was able to provide reasonable assurance that the design function of the applicable system was not adversely affected. 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. Specifically, the licensee failed to use decision making practices that emphasized prudent choices over those that are simply allowable when condition reports were dispositioned without expanding the scope of review based on known nonconformances and potential issues identified in previous NRC violations, construction experience, and licensee extent of condition reviews. (1A38)

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## Construction/Installation

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**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:** 05200026/2019004-01

**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/ft<sup>3</sup>) 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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## **Inspection/Testing**

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## **Security Programs**

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**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:** 05200026/2019001-02

**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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## Operational Programs

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