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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/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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