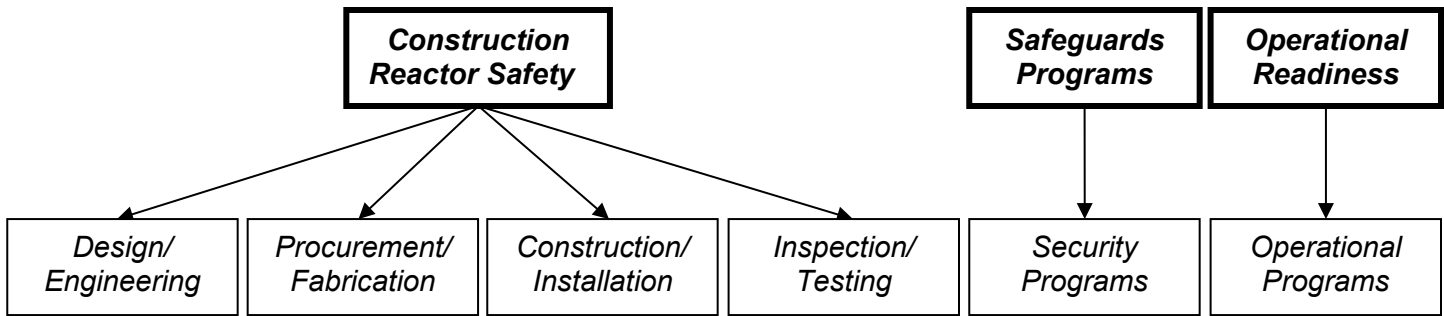


## Vogtle Unit 3 Q3/2020 Performance Summary

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



### Most Significant Inspection Findings

3Q/2020	No findings this quarter	No findings this quarter	<u>G</u>	<u>G</u>	No findings this quarter	No findings this quarter
2Q/2020	No findings this quarter	No findings this quarter	<u>G</u>	No findings this quarter	No findings this quarter	No findings this quarter
1Q/2020	No findings this quarter	No findings this quarter	No findings this quarter	No findings this quarter	No findings this quarter	No findings this quarter
4Q/2019	No findings this quarter	<u>G</u>	<u>G</u>	No findings this quarter	No findings this quarter	No findings this quarter

### Additional Inspection and Assessment Information

- ❖ [List of Construction Inspection Reports](#)
- ❖ [List of Construction Assessment Reports/Inspection Plans](#)
- ❖ [Vogtle Unit 3 Findings Archive](#)

## Design Engineering

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## Procurement/Fabrication

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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:** 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

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**Identified By:** NRC

**Identification Date:** 07/17/2020

**Significance:** Green

**Item Type:** ITAAC Finding

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

05200025/2020003, 05200026/2020003

**Item Number:** 05200025/2020003-01

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

### Failure to Perform ASME Section III Leakage Examinations

The inspectors identified a construction finding of very low safety significance (Green) with an associated NCV of Title 10 of the Code of Federal Regulations (10 CFR 50), Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for the licensee's failure to perform leakage examinations of two American Society of Mechanical Engineers (ASME) Class 2, pressure-retaining, weld joints for containment penetrations P27 and P28 to satisfy the requirements of ASME Section III.

The performance deficiency was of more than minor safety significance, and thus a finding, because it represented an adverse condition that rendered the quality of a structure unacceptable or indeterminate, and required substantive corrective action. The inspectors determined this finding was not associated with an ITAAC; it 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 of very low safety significance because the licensee was able to demonstrate the design function of the applicable structure (containment vessel) would not be impaired by successfully reperforming a pneumatic test of the affected welds. The licensee entered this issue into its corrective action program as condition report (CR) 50056351. The inspectors determined the finding was indicative of present licensee performance and was associated with the cross-cutting aspect Avoid Complacency, in the area of Human Performance. Specifically, the licensee failed to ensure the contract individuals recognized and planned for the possibility of mistakes, latent problems, or inherent risk, even while expecting successful outcomes. The licensee did not ensure the contractor understood the location of the welds, ensure obstructions were not present, and ensure supporting procedures or drawings were referenced to satisfactorily perform targeted ASME Section III weld examinations during the pneumatic test. [H.12] (Section 1A07)

**Identified By:** NRC

**Identification Date:** 05/01/2020

**Significance:** Green

**Item Type:** ITAAC Finding

**Report:** Vogtle Electric Generating Plant, Units 3 And 4 - NRC Integrated Inspection Reports 05200025/2020002, 05200026/2020002

**Item Number:** 05200025/2020002-01

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

### **Failure to Correct Inadequate Thread Engagement for TZ Hilti Bolts**

The inspectors identified a construction finding of very low safety significance with an associated NCV of Title 10 of the Code of Federal Regulations (10 CFR) Part 50, Appendix B, Criterion XVI, "Corrective Action," for the licensee's failure to correct a condition adverse to quality related to inadequate thread engagement for TZ Hilti Bolts identified in condition report (CR) 50004237. Specifically, CR 50004237 was written to address specification SV3/SV4-SS01-Z0-011, Revision 0, which allowed post-installed anchors to be installed so that the end of the bolt was flush with the nut. In the instance of the TZ Hilti Bolts, bolt ends are tapered and when installed flush with the bolt resulted in inadequate thread engagement. This issue was entered into the licensee's corrective action program as CR 50039089. The licensee performed immediate corrective actions and was able to demonstrate with reasonable assurance that the lack of thread engagement would not affect the anchors ability to perform their intended safety function.

The performance deficiency was of more than minor safety significance, and thus a finding, because it represented an adverse condition that rendered the quality of a structure, system, and component (SSC), unacceptable or indeterminate, and required substantive corrective action. The inspectors determined this finding was not associated with an ITAAC; it was not associated with a security 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 Problem Identification and Resolution, in the area of Resolution. Specifically, the licensee failed to thoroughly evaluate the issue to

ensure that the resolution addressed the extent of condition for inadequate thread engagement identified in CR 50004237.

**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/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.

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### **Inspection/Testing**

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**Identified By:** NRC

**Identification Date:** 07/09/2020

**Significance:** Green

**Item Type:** ITAAC Finding

**Report:** Vogtle Electric Generating Plant, Units 3 And 4 - NRC Initial Test Program and Operational Programs Integrated Reports 05200025/2020009, 05200026/2020009

**Item Number:** 05200025/2020009-01

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

### **Failure to Complete Containment Prior to Unit 3 ILRT**

The inspectors identified a performance deficiency and an ITAAC finding of very low safety significance (Green) and an associated non-cited violation (NCV) of Title 10 of the Code of Federal Regulations (CFR) Part 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors," for the licensee's failure to complete the containment system in accordance with Option B, "Performance-

Based Requirements," prior to commencing the Unit 3 Type A containment integrated leak rate test (CILRT). The licensee entered this issue into their corrective action program (CAP) as CR 50061137 with planned corrective actions to complete the containment system and perform additional testing.

The performance deficiency was more than minor because it was material to the acceptance criteria of the ITAAC. The finding was associated with the Construction Reactor Safety – Inspection/Testing Cornerstone. Using IMC 2519, Appendix A, "Construction Significance Determination Process," this finding was determined to be of very low safety significance (Green) because it was associated with the containment system (CNS), which is in the low risk column of the AP1000 Construction Significance Determination Matrix, and was not a repetitive significant condition adverse to quality. In accordance with IMC 0613, Appendix F, "Construction Cross-Cutting Areas and Aspects," the finding was determined to be indicative of present licensee performance and was associated with the cross-cutting aspect of Change Management in the area of Human Performance. Specifically, rather than maintaining nuclear safety as the overriding priority, the design change associated with the new pressure boundary welds on the EPAs was not adequately evaluated to ensure compliance with regulatory requirements [H.3]. (Section 3T05)

**Identified By:** NRC

**Identification Date:** 08/04/2020

**Significance:** Green

**Item Type:** Construction Finding

**Report:** Vogtle Electric Generating Plant, Units 3 And 4 - NRC Initial Test Program and Operational Programs Integrated Reports 05200025/2020009, 05200026/2020009

**Item Number:** 05200025/2020009-02

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

### **Failure to Establish Adequate Procedure for Unit 3 72-hour Battery Performance Test**

The inspectors identified a performance deficiency and a construction finding of very low safety significance (Green) and an associated NCV of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for the licensee's failure to establish an adequate procedure for UFSAR required battery performance testing of the Division B and C, Class 1E, 72-hour batteries. The licensee entered this issue into their CAP as CRs 50058111, 50057805 and corrected the procedure prior to implementation.

The performance deficiency was determined to be more than minor and a finding because it represented a substantive failure to establish or implement an adequate program, process, procedure, or quality oversight function. The inspectors concluded the finding was associated with the Inspection/Testing cornerstone and assessed the finding in accordance with IMC 2519, "Construction Significance Determination Process," Appendix A, "AP 1000 Construction Significance Determination Process," Section 4. The inspectors determined the finding was of very low safety significance (Green) because the finding was not related to a security or operational program and the test had not been performed. In accordance with IMC 0613 Appendix F, "Construction Cross-Cutting Areas and Aspects," the inspectors determined the finding had a cross-cutting aspect of Avoid Complacency in the area of Human Performance. Specifically, the licensee did not properly proofread following a copy/paste from a previous section that allowed an incorrect number to propagate through the procedure [H.12]. (Section 3T12)

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