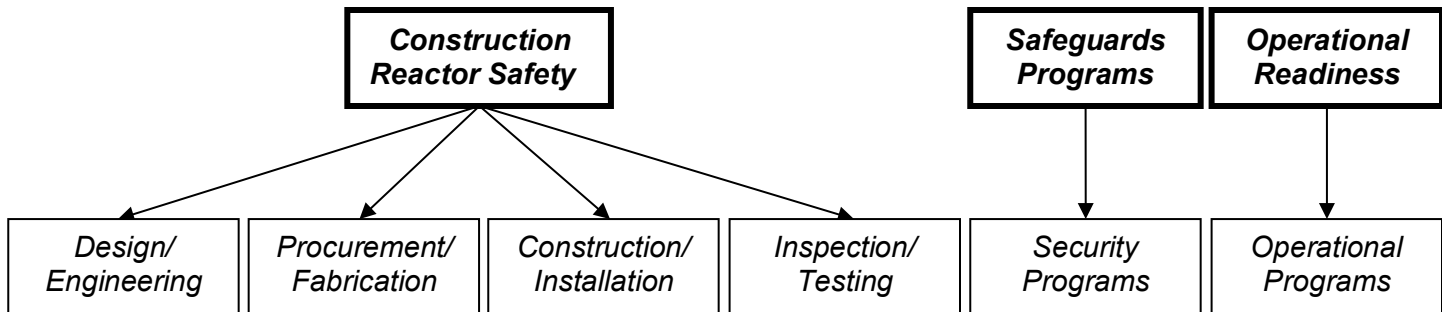


Vogtle Unit 3 2Q/2022 Performance Summary

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



Most Significant Inspection Findings

2Q/2022	No findings this quarter	No findings this quarter	G	G	No findings this quarter	No findings this quarter
1Q/2022	G	No findings this quarter	G	G	No findings this quarter	No findings this quarter
4Q/2021	No findings this quarter	No findings this quarter	G	G	No findings this quarter	No findings this quarter
3Q/2021	No findings this quarter	No findings this quarter	No findings this quarter	G	No findings this quarter	G

Additional Inspection and Assessment Information

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

Design Engineering

Identified By: NRC

Identification Date: 11/2/2021

Significance: Green

Item Type: Construction Finding

Report: Vogtle Electric Generating Plant, Units 3 And 4 - NRC Integrated Inspection Reports 05200025/2022001, 05200026/2022001

Item Number: 05200025/2022001-03

Note: Closed in Report (NCV)

Failure to Evaluate Applicable Design Inputs for EMC Glands

The inspectors identified a construction finding of very low safety significance with an associated NCV of 10 CFR 50, Appendix B, Criterion III, "Design Control," for the licensee's failure to assure applicable regulatory requirements and the design basis, as defined in § 50.2 and as specified in the license application, for those structures, systems, and components (SSCs) to which this appendix applies are correctly translated into specifications, drawings, procedures, and instructions. Specifically, the licensee's failure to evaluate applicable design inputs in the design package (E&DCR APP-GW-GEF-2640) that installed EMC glands in Class 1E plant electrical enclosures was a PD. The licensee entered this finding into its CAP for evaluation and identification of appropriate corrective actions as CR 50125873. As immediate corrective actions, the licensee issued new E&DCRs APP-GW-GEF-519 and APP-GW-GEF-529 that analyzed, and provided seismic testing results, indicating the seismic input for the EMC glands met the as-built seismic Category II, Class D component and would not adversely affect the ability of plant Class 1E electrical enclosures to perform their intended safety function during a seismic event.

The PD was of more than minor safety significance, and thus a finding, because it represented a substantive non-conservative error in a design document that defines the technical requirements for plant Class 1E electrical enclosures and justification was required by the licensee to ensure the as-built seismic Category II, Class D component did not adversely affect the ability of plant Class 1E electrical enclosures to perform their intended safety function during a seismic event. The inspectors determined the finding was not material to an ITAAC and therefore it was a construction finding because the EMC gland seismic qualifications did not impact the seismic qualifications and acceptance criteria of ITAAC related 1E panels in which the glands were installed. The finding was of very low safety significance (Green) because the licensee subsequently revised the design documents to include seismic evaluation and testing results that determined the EMC glands would not affect seismic Category I SSCs during a seismic event. The inspectors determined the finding was indicative of present licensee performance and was associated with the cross-cutting aspect of Change Management in the area of Human Performance. The proximate cause of the PD was attributed to the licensee's failure to implement a process where managers maintain a clear focus on nuclear safety when implementing the change management process to ensure significant unintended consequences are avoided.

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Procurement/Fabrication

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Construction/Installation

Identified By: NRC

Identification Date: 06/21/2022

Significance: Green

Item Type: ITAAC Finding

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

05200025/2022003, 05200026/2022003 and Second Quarter Assessment Follow-up Letter

Item Number: 05200025/2022003-02

Note: Closed in Report (NCV)

Failure to Maintain Cable Separation Requirements for Valves PXS-PL-V130A, SGS-PL-V036A, VWS-PL-V086, and CVS-PL-V090 for ITAAC 3.3.00.07d.ii.b (801)

NRC inspectors identified an ITAAC finding of very low safety significance with associated NCV of Title 10 of the Code of Federal Regulations, Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for the licensee's failure to maintain the 1-inch physical separation required for safety-related (SR) and nonsafety-related (NSR) cables for valves passive core cooling system (PXS) PXS-PL-V130A, steam generator system (SGS) SGS-PL-V036A, central chilled water system (VWS) VWS-PL-V086, and chemical and volume control system (CVS) CVS-PL-V090 as stated in electrical specification APP-G1-V8-001, "AP1000 Electrical Installation Specification," Revision 11. The failure to maintain the 1-inch physical separation required for SR and NSR cables, is a performance deficiency (PD). The licensee entered this issue into the corrective action program (CAP) as condition reports (CRs) 50144333, CR 50144475, CR 50145108, and CR 50145447. Immediate corrective actions, for this issue, included rework to restore compliance with the separation requirements.

The PD was of more than minor safety significance, and thus a finding, because it represented an adverse condition that rendered the quality of the safety function associated with the Class 1E raceway structure unacceptable and required substantive corrective action. Specifically, it impacted the structure's design function to maintain physical separation between Class 1E divisions and between Class 1E divisions and non-Class 1E cables. This violation was determined to be an ITAAC finding because it impacted ITAAC 3.3.00.07d.ii.b (801) which states physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables inside non-radiologically controlled areas in the auxiliary building. The inspectors determined this finding was indicative of present licensee performance and was associated with the cross-cutting aspect of Field Presence, in the area of Human Performance in accordance with IMC 0613, Appendix F, Construction "Cross-Cutting Areas and Aspects," dated November 4, 2020. The proximate cause of the PD was attributed to failure to ensure leaders were in the work areas observing, coaching, and reinforcing standards and expectations during field work.

Identified By: NRC

Identification Date: 01/18/2022

Significance: Green

Item Type: ITAAC Finding

Report: Vogtle Electric Generating Plant, Units 3 And 4 - NRC Integrated Inspection Reports 05200025/2022001, 05200026/2022001

Item Number: 05200025/2022001-01

Note: Closed in Report (NCV)

Failure to Review and Control Process and Quality Standard Deviations on the IDS Battery Racks

The inspectors identified an ITAAC finding of very low safety significance with an associated NCV of Title 10 of the Code of Federal Regulations Part 50 (10 CFR 50), Appendix B, Criterion III, "Design Control." The licensee's failure to assure the Unit 3 Class 1E dc and uninterruptible power supply system (IDS) 24-hour, 72-hour, and spare safety-related battery racks were installed in accordance with ITAAC 2.6.03.02.i (597) and the approved design was a performance deficiency (PD). The licensee entered this finding into its corrective action program (CAP) as condition report (CR) 50130395 for evaluation and identification of corrective actions. As immediate corrective actions, the licensee restored the as-built configuration of the Unit 3 IDS battery racks to match the seismically qualified condition specified by the design.

This PD 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. Specifically, with the nonconforming conditions the IDS batteries did not meet the acceptance criteria. The finding was of very low (Green) safety significance because the licensee was able to demonstrate

with reasonable assurance through additional analyses that the design function of the Class 1E IDS batteries would not be impaired by the PD, and the nonconforming conditions were corrected such that the installation is seismically bounded by the tested or analyzed conditions. The finding was indicative of current licensee performance and was associated with the cross-cutting area of Human Performance and the cross-cutting aspect of Procedure Adherence. The proximate cause of the PD was attributed to a failure to review procedures and instructions before work was performed to validate they were appropriate for the scope of work and required changes were completed before implementation.

Identified By: NRC

Identification Date: 10/20/2021

Significance: Green

Item Type: Construction Finding

Report: Vogtle Electric Generating Plant, Units 3 And 4 - NRC Integrated Inspection Reports 05200025/2021007, 05200026/2021007

Item Number: 05200025/2021007-01

Note: Open in Report (NCV)

Failure to Correct Cable Separation issues in panel SV3-IDSC-DT-1

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," was identified for the licensee's failure to identify and correct conditions adverse to quality pertaining to Institute of Electrical and Electronic Engineers 384-1981 cable separation issues inside Class 1E dc and uninterruptible power supply system (IDS) regulating transformer panel SV3-IDSC-DT-1. The licensee failed to maintain the 1-inch separation required for safety and nonsafety-related cables within IDS 'C' regulating transformer panel SV3-IDSC-DT-1 in accordance with electrical installation specification APP-G1-V8-001, Appendix B2, "Separation and Segregation Spacing Requirements." Two conditions were identified. The licensee entered this finding into its corrective action program as condition report 50117479. Corrective actions for this issue included rework to restore compliance with the separation requirements and the initiation of a causal analysis.

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 the safety function associated with IDS unacceptable or indeterminate and required substantive corrective action. The inspectors determined this finding was a performance deficiency of very low safety significance because if left uncorrected it could reasonably be expected to impair the design function of IDS for 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 Work Management, in the area of Human Performance. The licensee failed to implement a process of planning, controlling, and executing work activities such that nuclear safety was the overriding priority. Specifically, the licensee failed to have a process in place for quality control to verify all cable separation nonconformances were addressed inside the panel.

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Inspection/Testing

Identified By: Licensee

Identification Date: 04/26/2022

Significance: Green

Item Type: ITAAC Finding

Report: Vogtle Electric Generating Plant, Units 3 And 4 - NRC Integrated Inspection Reports 05200025/2022003, 05200026/2022003 and Second Quarter Assessment Follow-up Letter

Item Number: 05200025/2022003-01

Note: Closed in Report (LIV)

Failure to Provide Sufficient Information in the ICN for ITAAC 2.2.03.08c.xiii (198)

10 CFR 52.99I(1), "ITAAC Closure Notification," requires, in part, that the licensee notify the NRC that the prescribed inspections, tests, and analyses have been performed and that the prescribed acceptance criteria are met. The notification must contain sufficient information to demonstrate that the prescribed inspections, tests, and analyses have been performed and that the prescribed acceptance criteria are met. Contrary to the above, on April 19, 2022, the licensee failed to provide sufficient information in the ICN for ITAAC 2.2.03.08c.xiii (198) to demonstrate that the prescribed inspections, tests, and analyses had been performed and that the prescribed acceptance criteria were met. Specifically, the licensee determined sometime after April 26, 2022, that the prescribed acceptance criteria had not been met at the time the ICN was submitted due to the presence of a carbon steel spreader plate within the exclusion zone defined in the ITAAC.

The performance deficiency was considered more than minor and a finding because it represented a substantive failure to implement an adequate program, process, procedure, or quality oversight function. Specifically, the licensee failed to develop an ICN that accurately reflected ITAAC completion as supported by verifiable documents and traceable records. The inspectors also determined the finding could be associated with a specific ITAAC and was material to the acceptance criteria of an ITAAC since it was associated with non-conforming material located within the exclusion zone defined in ITAAC 2.2.03.08c.xiii (198). Based on the size of the spreader plate and connection between the plate and structural module, the inspectors determined that the design function of the affected SSC would not have been impaired by the deficiency. As a result, the inspectors concluded the finding was of very low safety significance (Green).

Identified By: NRC

Identification Date: 04/26/2022

Significance: Green

Item Type: ITAAC Finding

Report: Vogtle Electric Generating Plant, Units 3 And 4 - NRC Initial Test Program and Operational Programs Integrated Inspection Reports 05200025/2022004, 05200026/2022004

Item Number: 05200025/2022004-01

Note: Closed in Report (NCV)

Failure to Use Appropriate M&TE

NRC inspectors identified an ITAAC finding of very low safety significance and with an associated non-cited violation (NCV) of Title 10 of the Code of Federal Regulations, Part 50 (10 CFR 50), Appendix B, Criterion V, "Instructions, Procedures, and Drawings," was identified for the licensee's failure to accomplish preoperational testing activities in accordance with procedure 3-FPS-OTS-17-001, "FPS Check Valve Exercise Test," Revision 0.1. The licensee entered this issue into the corrective action program (CAP) as CRs 50136335 and 50140727.

The performance deficiency was determined to be more than minor because it invalidated the performance of the test described in the ITAAC. The inspectors determined that the issue was an ITAAC finding because it was material to the acceptance criteria of ITAAC 2.2.01.11a.iv. Specifically, the licensee failed to utilize measuring and test equipment that was accurate and within the appropriate range necessary to verify that valve 3-FPS-V052 was closed and the ITAAC acceptance criteria was met when the licensee failed to use a 0-20 gpm calibrated flowmeter or equivalent as specified by the procedure. The finding was determined to be of very low safety significance (Green) due to the licensee demonstrating with reasonable assurance that the design function of the applicable system was not impaired by the deficiency. The inspectors determined the finding was indicative of present licensee performance and was associated with the cross-cutting aspect of challenge the unknown, in the area of human performance. Specifically, the licensee should have questioned signing the test as being performed satisfactorily when the measuring and test equipment was not appropriate.

Identified By: NRC

Identification Date: 06/01/2022

Significance: Green

Item Type: Construction Finding

Report: Vogtle Electric Generating Plant, Units 3 And 4 - NRC Initial Test Program and Operational Programs Integrated Inspection Reports 05200025/2022004, 05200026/2022004

Item Number: 05200025/2022004-02

Note: Closed in Report (NCV)

Failure to Translate Design Requirements into Procedure 3-IDS-ITPP-501

NRC inspectors identified a construction finding of very low safety significance and a NCV of 10 CFR, Appendix B, Criterion III, "Design Control," for the licensee's failure to translate design requirements of the Class 1E DC and UPS system into preoperational testing procedure 3-IDS-ITPP-501, "Class 1E DC and UPS Preoperational Test," Rev. 7. The licensee entered this issue into their corrective action program as CR 50141588.

The performance deficiency was determined to be more than minor and a finding because it affected the procedure quality attribute of the construction reactor safety cornerstone objective (Inspection/Testing). Specifically, the procedure would have allowed the safety-related battery chargers to operate outside of the 0.5% nominal voltage design requirements and exceed the maximum float output voltage of 270 VDC contained in design requirements. The finding was determined to be of very low safety significance (Green) because the finding did not impair a design function. The inspectors determined this finding was indicative of present licensee performance and was associated with the cross-cutting aspect of change management, in the area of human performance. The proximate cause was attributed to the failure to use a systematic process for evaluating and implementing change so that nuclear safety remains the overriding priority.

Identified By: NRC

Identification Date: 12/12/2021

Significance: Green

Item Type: ITAAC Finding

Report: Vogtle Electric Generating Plant, Units 3 And 4 - NRC Integrated Inspection Reports 05200025/2022001, 05200026/2022001

Item Number: 05200025/2022001-02

Note: Closed in Report (NCV)

Failure to Provide Sufficient Information in the ICN for ITAAC 761

The inspectors identified an ITAAC finding of very low safety significance with an associated NCV of 10 CFR 52.99(c)(1), "ITAAC Closure Notification," for the licensee's failure to submit an ITAAC closure notification (ICN) for Unit 3 ITAAC 3.3.00.02a.i.b (761) that contained sufficient information to demonstrate the prescribed inspections, tests, and analyses had been performed and the prescribed acceptance criteria were met and was a PD. As immediate corrective actions, the licensee withdrew the ICN. Subsequently, the licensee completed an engineering evaluation to address areas of the shield building concrete wall with thickness not meeting the requirements of the Vogtle 3 and 4 Updated Final Safety Analysis Report Table 3.3-1 and the as-built summary report for the shield building was updated to reflect the closure of the associated nonconformance and disposition report (N&D). The licensee entered this finding into its CAP for evaluation and identification of corrective actions as CR 50127060.

The PD was of more than minor safety significance and an ITAAC finding because it represented a substantive failure to implement a program, process, procedure, or quality oversight function that was material to the acceptance criteria of an ITAAC. Specifically, the licensee failed to develop an ICN that accurately reflected ITAAC completion as supported by verifiable documents and traceable records. As a result, the ICN would have been rejected by the NRC, if it had not been withdrawn voluntarily. The PD was material to the acceptance criteria of an ITAAC since it was associated with deviations that had not been repaired or reconciled to the approved design as required by the ITAAC. Based on review of N&D

SV3-CC01-GNR-000686, the inspectors determined the design function of the affected structure would not have been impaired by the deficiency. As a result, the inspectors concluded the 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 in the area of Human Performance. The proximate cause of the PD was attributed to the failure to use conservative decision making when submitting the ICN without having all the determination basis input documents finalized.

Identified By: NRC

Identification Date: 10/15/2021

Significance: Green

Item Type: ITAAC Finding

Report: Vogtle Electric Generating Plant, Units 3 And 4 - NRC Initial Test Program and Operational Programs Integrated Inspection Reports 05200025/2021008, 05200026/2021008

Item Number: 05200025/2021008-01

Note: Open in Report (NCV)

Failure to Prescribe Instructions or Procedures for ITAAC Activities that Affect Quality

NRC inspectors identified a Green ITAAC finding and associated non-cited violation (NCV) of Title 10 of the Code of Federal Regulations (10 CFR 50), Appendix B, Criterion V, "Instructions, Procedures, and Drawings," and with an associated Severity Level (SL) IV violation of 52.99(c)(1), "ITAAC Closure Notification," for the licensee's failure to coordinate and collaborate with the ITAAC Project Team (IPT) to identify and collect ITAAC determination basis input documents for ITAAC C.2.6.09.06 (Index Number 647) to demonstrate the vehicle barrier system could protect against the design basis threat vehicle bombs prior to submitting the ITAAC Closure Notification in accordance with procedure ND-RA-001-006, "Development and Approval of ITAAC Submittals (ICN, UIN, PCN)." The licensee entered this issue into its corrective action program (CAP) as condition report (CR) 50118429.

The performance deficiency was determined to be more than minor because it represented a substantive failure to establish or implement an adequate program, process, procedure, or quality oversight function. The inspectors determined this finding was of very low safety significance (Green) because the vehicle barrier function was not required per 10 CFR 73.55 at that time. The inspectors determined the finding had a cross-cutting aspect of Conservative Bias in the area of Human Performance. Specifically, the licensee failed to use conservative decision making when submitting the ITAAC Closure Notice (ICN) without all the determination basis input documents finalized.

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Operational Programs

Identified By: SNC

Identification Date: 08/12/2021

Significance: Green

Item Type: Construction Finding

Report: Vogtle Electric Generating Plant, Units 3 And 4 - NRC Initial Test Program and Operational Programs Integrated Inspection Reports 05200025/2021005, 05200026/2021005

Item Number: 05200025/2021005-01

Note: Closed in Report (NCV)

Failure to Follow Procedure 3-IDSC-SOP-002

A self-revealed construction finding of very low safety significance with an associated noncited violation (NCV) of Title 10 of the Code of Federal Regulations (10 CFR), Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," was identified for the licensee's failure to accomplish activities in procedure 3-IDSC-SOP-002, "Class 1E AC System – Division C," Version 0 in accordance with procedure NMP-AP-003, "Procedure and Work Instruction Use and Adherence," Version 6.1. The licensee entered this issue into its corrective action program (CAP) as condition report (CR) 50103788, CR 50103789, and CR 50103907.

The performance deficiency was determined to be of more than minor significance and thus a finding because it represented a substantive failure to implement an adequate program, process, procedure, or quality oversight function. The inspectors determined the finding was of very low safety significance (Green) because the event impaired only one train of the IDS. The inspectors determined the finding had a cross-cutting aspect of H.2, Field Presence, in the area of Human Performance. Specifically, senior managers did not ensure that operators performing 3-IDS-SOP-002 had adequate supervisory and management oversight of work activities which led to plant equipment being damaged.

Identified By: NRC

Identification Date: 09/30/2021

Significance: Green

Item Type: Construction Finding

Report: Vogtle Electric Generating Plant, Units 3 And 4 - NRC Initial Test Program and Operational Programs Integrated Inspection Reports 05200025/2021005, 05200026/2021005

Item Number: 05200025/2021005-02

Note: Closed in Report (NCV)

Failure to Obtain a License Amendment Prior to Altering Dynamic Restraint Qualification Requirements

The NRC inspectors identified a performance deficiency and construction finding of very low safety significance and an associated Severity Level (SL) IV non-cited violation (NCV) of 10 CFR 50.59, "Changes, tests, and experiments," for the licensee's failure to perform a written safety evaluation prior to implementing a change to remove ASME QME-1-2007 commitments from the UFSAR in accordance with procedure ND-LI-VNP-002. The licensee entered this issue into its corrective action program as CR 50098695.

The inspectors determined that the failure to follow procedure ND-LI-VNP-002 to perform a 10 CFR 50.59 evaluation for the removal of ASME QME-1-2007 commitments from the design bases was a violation of 10 CFR 50.59(d)(1), and a performance deficiency. Per the guidance in IMC 0613, Appendix E, "Examples of Minor Construction Issues," the performance deficiency was determined to be more than minor, and thus a finding, because it represented a substantive failure to establish or implement an adequate program, process, procedure, or quality oversight function. Specifically, the removal of QME-1-2007 for dynamic restraints constituted a more than minimal increase in the likelihood of a malfunction of a structure, system, or component important to safety and there was a reasonable likelihood that the change would have required Commission review and approval prior to implementation in accordance with 10 CFR 50.59(c)(2)(ii). The inspectors determined the finding had a cross-cutting aspect of H.3, Change Management in the area of Human Performance. Specifically, the licensee failed to ensure the process for reviewing the change to remove QME-1-2007 for dynamic restraints was systematic in that all aspects of QME-1-2007 were evaluated for their impact on dynamic restraints.

Identified By: NRC

Identification Date: 09/30/2021

Significance: Green

Item Type: ITAAC Finding

Report: Vogtle Electric Generating Plant, Units 3 And 4 - NRC Initial Test Program and Operational Programs Integrated Inspection Reports 05200025/2021005, 05200026/2021005

Item Number: 05200025/2021005-03

Note: Closed in Report (NCV)

Failure to Demonstrate Qualification of Valve Nonmetallic Parts

NRC inspectors identified a performance deficiency and ITAAC finding of very low safety significance and an NCV of 10 CFR 50.49(e)(5), "Environmental qualification of electric equipment important to safety for nuclear power plants," for the licensee's failure to establish the qualified lives of all nonmetallic components necessary for the completion of the safety function of the squib and main steam isolation (MSI) valves in accordance with procedure APP-GW-G1-002, "AP1000 Equipment Qualification Methodology." The licensee entered this issue into its CAP as CR 50096894.

The performance deficiency was determined to be more than minor, and thus a finding, because it is material to the acceptance criteria of the ITAAC, and the performance deficiency prevented the licensee from meeting the ITAAC Design Commitment. The inspectors determined this finding was of very low safety significance because the finding did not impair a design function of the valves. The inspectors determined no cross-cutting aspect applied because the performance deficiency did not reflect current licensee performance.

Identified By: NRC

Identification Date: 07/19/2021

Significance: Green

Item Type: ITAAC Finding

Report: Vogtle Electric Generating Plant, Units 3 And 4 - NRC Initial Test Program and Operational Programs Integrated Inspection Reports 05200025/2021005, 05200026/2021005

Item Number: 05200025/2021005-04

Note: Closed in Report (NCV)

Failure to Demonstrate Qualification of Containment High Radiation Monitor Door Gasket

NRC inspectors identified an ITAAC finding and associated NCV of 10 CFR 50.49.e(5) for the failure to establish the qualified life of the Containment High Range Monitor (CHRM) door gasket in accordance with Institute of Electrical and Electronics Engineers Standard (IEEE) 323-1974. The licensee entered this issue into its CAP as CR 50096896 and CAP-IR-2021-6870 and is working on corrective actions to address the issue.

The performance deficiency was determined to be more than minor, and thus a finding, because it represented an adverse condition that rendered the quality of a system, structure, or component (SSC), unacceptable or indeterminate, and required substantive corrective action. The inspectors determined that the finding was of very low safety significance because the finding was not associated with a system or structure in risk importance table. The inspectors determined the finding was associated with the cross-cutting aspect of "Consistent Process" in the area of Human Performance. Specifically, the licensee failed to use a consistent, systematic approach to make decisions whether the AP1000 harsh environment included wetted environments.

Identified By: NRC

Identification Date: 07/9/2021

Significance: Green

Item Type: ITAAC Finding

Report: Vogtle Electric Generating Plant, Units 3 And 4 - NRC Initial Test Program and Operational Programs Integrated Inspection Reports 05200025/2021005, 05200026/2021005

Item Number: 05200025/2021005-05

Note: Closed in Report (NCV)

Failure to Qualify EPAs in Accordance with IEEE 317

NRC identified an ITAAC finding and associated violation of 10 CFR 50, Appendix B, Criterion III, for the failure to seismically or environmentally qualify the Electrical Penetration Assemblies (EPAs) in accordance with IEEE 317, Section 6.2.10. Specifically, the licensee failed to test or analyze the as installed assembly including cable configurations, terminations, termination box, raceways, and their respective interactions. The licensee entered this issue into its CAP as CR 50104476 and is working on corrective actions to address the issue.

The performance deficiency was determined to be more than minor, and thus a finding, because it represented an adverse condition that rendered the quality of an SSC unacceptable or indeterminate and required substantive corrective action. The inspectors determined the finding was of very low safety significance because the licensee was able to show through additional analysis that the finding did not impact a design function of the EPAs. The inspectors determined the finding was associated with the cross-cutting aspect of "Change Management" in the area of Human Performance. Specifically, the licensee leadership failed to use a systematic process for evaluating and implementing changes to as installed SSCs compared to configurations that were environmentally qualified so that nuclear safety remained the overriding priority.

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