

Additional Inspection and Assessment Information

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# **Construction/Installation**

Identified By: NRC Identification Date: 10/25/2022 Significance: Green Item Type: Construction Finding Report: Vogtle Electric Generating Plant, Unit 4 - NRC Integrated Inspection Report 05200026/2022007 Item Number: 05200026/2022007-01 Note: Open/Closed in Report (NCV)

### Failure to Include Certain Cables for Resistance Insulation (Megger) Testing

A construction finding of very low safety significance (Green) with an associated 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 include the insulation resistance (megger) testing of certain "Y" service cables as required by specification APP-G1-V8-001 and procedure 26139-000-4MP-T81C-N3305, Appendix 1. The failure to include megger testing of certain "Y" service cables as required by the specification and the procedure was a violation of 10 CFR Part 50, Appendix B, Criterion V, and was a performance deficiency (PD). The licensee entered this issue into its corrective action program as condition reports 50159622 and 50164626. As immediate corrective actions, the licensee meggered the missed cable to restore compliance, commenced an extent of condition review, and initiated an evaluation of procedure revision.

The PD was of more than minor safety significance, and thus a finding, because it represented an adverse condition where the meggering requirements for the "Y" type service cables were not included in the testing procedure that rendered the quality of the safety function associated with the protection and safety monitoring system indeterminate and required substantive corrective action. Specifically, the failure to include the insulation resistance (megger) testing of certain "Y" service cables resulted in cable SV4-CVS-EWPLV045JYA not being megger tested and rendered the capability of letdown containment isolation valve CVS-PL-V045 indeterminate in the event of receiving a containment isolation signal. This violation was determined to be a construction finding because the finding is not material to the acceptance criteria of an ITAAC. The inspectors determined the finding was indicative of present licensee performance and was associated with the cross-cutting aspect of Documentation, 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 the failure to create and maintain complete, accurate and up-to-date procedure documentation.

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### Inspection/Testing

Identified By: NRC Identification Date: 03/20/2023 Significance: Green Item Type: Construction Finding Report: Vogtle Electric Generating Plant, Unit 4 - NRC Initial Test Program and Operational Programs Integrated Inspection Reports 05200026/2023006 Item Number: 05200026/2022006-01 Note: Open/Closed in Report (NCV)

### Failure to Use Appropriate M&TE

An NRC-identified construction finding of very low safety significance (Green) with an associated noncited violation (NCV) of Title 10 Code of Federal Regulations (10 CFR), Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," was identified for the licensee's failure to ensure that all measuring and test equipment (M&TE) used to perform baseline thermal expansion measurements at the beginning of hot functional testing (HFT) were verified to be within their calibrated frequencies prior to use and documented on the M&TE usage log in accordance with procedure B-GEN-ITPA-004, "Conduct of Test." The licensee entered this issue into the corrective action program (CAP) as CR 50171546 and reperformed the test using calibrated M&TE that was accurately recorded in the M&TE usage log.

The performance deficiency was determined to be more than minor because it represented a substantive failure to implement an adequate program, process, procedure, or quality oversight function. The inspectors determined the finding to be of very low safety significance (Green) due to the licensee demonstrating with reasonable assurance that the design function of the applicable systems was not impaired by the deficiency. The inspectors determined the finding had a cross-cutting aspect of Challenge the Unknown in the area of Human Performance. Specifically, the licensee should have questioned the calibration status of the M&TE to be used during the test prior to certifying the test prerequisites were satisfied.

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#### **Security Programs**

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### **Operational Programs**

Identified By: NRC Identification Date: 07/18/2022 Significance: Green Item Type: Construction Finding Report: Vogtle Electric Generating Plant, Unit 4 - NRC Initial Test Program and Operational Programs Integrated Inspection Report 05200026/2022006 Item Number: 05200026/2022006-01 Note: Open/Closed in Report (NCV)

#### NRC Annual Operating Test Scenarios Did Not Meet Qualitative Standards

NRC inspectors identified a construction finding of very low safety significance for the licensee's failure to identify the procedures required to be entered and expected operator actions to be performed in the simulator exam guides in accordance with NMP-TR-424-F05, "Annual Simulator Exam Development & Validation." Specifically, 9 out of 25 of the events in four sampled scenario guides used to evaluate licensed operators during the 2022 annual operating test lacked adequate crew/operator performance standards.

The performance deficiency was determined to be more than minor and a finding because it affected the training and qualification attribute of the Operational Readiness Cornerstone (Operational Programs). Specifically, the failure of the licensee to identify in simulator exam guides the required procedures to be entered and operator actions to be performed affected the quality of the 2022 annual operating test administered to all licensed operators and could have impacted the licensee's ability to evaluate the licensed operators. The performance deficiency did not impact an ITAAC, and therefore was determined to be a construction finding. The inspectors determined that the finding was associated with the

Operational Readiness Cornerstone and assessed the finding in accordance with IMC 2519, "Construction Significance Determination Process," Appendix A, "AP-1000 Construction Significance Determination Process." Using the flowchart in Appendix A, since the finding was related to the licensed operator requalification (LOR) program, and the program was already required to be implemented, the finding was further assessed using the Reactor Oversight Process IMC 0609, "Significance Determination Process," (SDP) Appendix I, "Licensed Operator Requalification Significance Determination Process," Figure I.1, "Licensed Operator Requalification SDP Flowchart." The finding was related to the quality of the annual operating test but did not include greater than 40% of the reviewed simulator scenario events that were flawed; therefore, the inspectors determined that the finding was of very low safety significance (Green). The inspectors determined this finding was indicative of current licensee performance and was associated with the cross-cutting aspect of procedure adherence, in the area of human performance in accordance with IMC 0613, Appendix F, "Construction Cross-Cutting Areas and Aspects." The proximate cause was attributed to the failure to follow processes, procedures, and work instructions.

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