

# **Vogtle Experience under Traditional Enforcement**

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December 16, 2010

# **Vogtle 3 & 4**

## **Oversight and Inspection**

- Construction Process at Vogtle is subject to significant NRC Oversight and Inspection
- In June 2010, NRC initiated its periodic assessment of Vogtle construction which includes six month assessments with semi-annual performance reviews and annual public meetings

# Vogtle 3 & 4

## Oversight and Inspection

- Inspections Planned for the First Year
  - Backfill Operations [complete]
  - Fitness for Duty (FFD) [complete]
  - Multiple Quality Assurance Inspections [two complete]
  - Shear Wave Testing (Dec 2010)
  - 10 CFR 50.55(e) and Part 21
  - Corrective Action Program (CAP)
  - Containment Vessel Fabrication
  - Mud Mats and Water Proof Membrane Construction
  - Mechanically Stabilized Earth (MSE) Wall Construction

# Vogtle 3 & 4

## Under Traditional Enforcement

- Violations Issued:
  - **Notice of Violation (NOV) 2009-201-01** for Procedure not reflecting requirements of Part 21 or Part 50.55(e)
  - **NOV 2009-201-02** for CAP Program not screening new items for Part 21 or Part 50.55(e)
  - **Non Cited Violation (NCV) 2009-201-03** for Training Program inconsistencies related to Part 21 requirements
  - **Finding 2010-001-01** for Use of Backfill Material from a Source not Described in the Site Safety Evaluation Report (SSAR)
  - **Licensee Identified Violation (LIV) 2010-003-01** for Failure to Complete Self Disclosures and Suitability Inquiries

# Vogtle 3 & 4

## Under Proposed cROP with SDP

- These issued would have been classified as Minor or at most Green NCVs:
  - **NOV 201-01 and 201-02** requirements of Part 21 or 50.55(e) – no reporting requirement missed
  - **NCV 201-03** Training Program References – “self identified and Non-Cited”
  - **Finding 001-01** Backfill Material from a Different Source – “minor violation of minimal safety significance”
  - **LIV 003-01** Self Disclosures and Suitability Inquiries – “very low safety significance”

# cRROP with SDP

## Best for NRC, Industry, and the Public

- The Construction Inspection Process using the cRROP with SDP will allow the NRC and Industry to focus on the significant issues
- NRC and Industry will not be distracted by having to respond on the docket to issues of low safety significance that are addressed in the site's CAP
- The Public will not be distracted with minor issues being identified as severity level 4 violations
- cRROP allows NRC to focus on issues of significance (greater than green) and assess performance against cornerstone objectives
- The focus of the NRC and the public will remain on significant issues

# Conclusion

- SNC strongly supports the cROP process
- SNC Considers the dialog between NEI and the staff successful to date
- SNC urges the Commission to endorse the SECY with Option 3 and move to implementation