



**Enquiries:** N Silinga  
**Our reference:** k10002011N  
**Your reference:** N/A

06 May 2025

Senior Manager (Nuclear Licensing)  
C/o Nuclear Licensing  
Koeberg Nuclear Power Station  
Private Bag X10  
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Dear Sir

**KOEBERG NUCLEAR POWER STATION: NNR DIRECTIVE - NON-COMPLIANCE TO NIL-01- LICENCE CONDITION 12.2**

Your letter K-30914-E dated 11 April 2025 and NNR letters k30914N dated 11 April 2025, k30914.1N dated 24 April 2025 and k30914.2N dated 29 April 2024 refers.

- 1) The NNR hereby issues this directive in terms of Section 41 (4) (e) (i) of the NNR Act (Act No.47 of 1999).
- 2) The directive is based on the findings of the NNR inspection as documented in letters k30914.1N dated 24 April 2025 and k30914.2N dated 29 April 2024.
- 3) PP-0012 "Manufacturing of Components for Nuclear Installations", section 7.3, "During Manufacturing" states that: "The NNR may send inspector(s) to the site of the manufacturer to perform inspections and surveillances as part of its regulatory oversight during manufacturing. The NNR inspector(s) will have the right of access to any place where licensed parts of a nuclear installation as contemplated in the licence application are present or being manufactured as well as to the relevant documents, records, and persons.

- 4) The NNR was notified on 11 April 2025 about upcoming intervention points identified in the manufacturing Quality Control Plans (QCPs) at NECSA on 14 -15 April 2024. All activities could not be completed on the indicated days and were continued on 21 April 2025 at the Allweld Nuclear and Industrial Facility in Cape Town (Ndabeni).
- 5) The NNR participated in these intervention points both at NECSA and Allweld (Ndabeni) and the summary of outcomes are attached in letter k30914.1N.
- 6) After the issuance of letter k30914.1N, the NNR performed various plant walkdowns and held interviews with the technical staff tasked with the oversight of the implementation of the EERI MOD 12004 and it was evident that various shortcomings related to the readiness of installation of the modification still existed as it was confirmed by the KNPS technical staff, as communicated in letter k30914.2N, dated 29 April 2025.
- 7) The NNR based on the observation above requested Eskom to ensure that no intrusive interventions for example cutting into existing pipe work were performed prior to submitting to the NNR the detailed documentation justifying readiness for installation as per the discussions in the meeting held on 29 April 2025.
- 8) The NNR was informed on 30 April 2025, that not all End of Manufacturing Reports (EOMR) were ready and available for evaluation by the NNR.
- 9) Eskom indicated that they were going to provide information that was available per spool piece as per their installation schedule with the readiness of the EOMR for the first of four spool pieces indicated to be 01 May 2025.
- 10)The NNR review of the first spool piece (1ASG120TY/1SRU301TY) thus took place on 01 May 2025 after the quality review of the documents by NECSA, the AIA, and Eskom.
- 11)The NNR noted various shortcomings that were communicated to the Team and summarised in the email correspondence. These shortcomings were related to the:
  - ASME Code compliance.
  - Completeness and availability/retrievability of records
  - Records reviewed for acceptability whilst there were errors that were highlighted by the NNR Inspector during the review.

- Configuration control which included amongst other things a weld BW2 on 1ASG120TY, not reflected on the hydrotest report. On enquiry by the NNR Inspector it was established that it was done in error.
- Non-adherence to the use of latest authorised revision of procedure.
- SAP anomalies.

12) From the shortcomings that have been identified by the Regulator as it relates to the implementation of this project EERI MOD 12004, it is evident that Eskom Senior Management is not developing the values and behavioural expectations for the organisation and for modelling these through their words and actions.

13) The following prescripts documented in RD-0034 have not been effectively implemented for the Regulatory findings highlighted up until 01 May 2025 and should be taken into consideration by Eskom and should, inter alia, be addressed by Eskom in the response:

- **6.1 Structure of an Integrated Management System (IMS)**

- ... *The application of the requirements and deployment of the appropriate resources need to be determined for an organisation on the basis of the safety importance and complexity of the organisation's products. The safety importance is derived considering the following aspects:*
  - *The hazards and the potential impact on nuclear and radiation safety associated with attributes of the product;*
  - *The possible nuclear consequences in terms of the Fundamental Safety Functions if any Structures, Systems and Components (SSC) fail or a service is carried out incorrectly.*

- **6.2 Safety Management System and Safety Culture Implementation (Level 1)**

- ... *The NNR requires that an appropriate level of SC be adopted within each organisation involved in processes with high nuclear safety importance.*
- ... *The performance of individuals and teams is strongly influenced by their working environment and atmosphere, particularly the behaviour of leaders. Senior management is responsible for developing the values and behavioural expectations for the organisation and for modelling these through their words and actions.*

- **6.3 Quality Management System** – All paragraphs
- **7.1 General Requirements on Organization** – Section 5 and 6
- **7.2 General Requirements on Organization** – Section 15 (Safety Culture Enhancement Plan) and Section 16
- **7.3 General Requirements on Documentation** – All paragraphs
- **8.1 Management Commitment** – Section 8.1.1 and 8.1.2 – subsections 30, 31 and 33
- **10.1 Planning and Management of Processes** – Section 10.1.1 – subsections 52, 53, 54 and 55
- **10.3 Design and Development** – Section 10.3.1 – subsection 62 and 63

14) The NNR notes that EERI MOD 12004, is a part of the LTO Safety Case Commitment due in October 2025 and the NNR has a responsibility to provide oversight in these activities.

15) Therefore, Eskom is directed to:

- a) Respond to letters k30914.1N, k30914.2N and the Regulatory comments associated with EOMR of 1ASG120TY/1SRU301TY.
- b) Ensure that the quality aspects related to RD-0034 are effectively incorporated in the EOMR prior to NNR review.

16) Eskom is required to respond to this letter within 7 days of receipt.

Please address all correspondence to the Programme Manager: Nuclear Power Plants.

Yours faithfully

Mr O Phillips

**DIVISIONAL EXECUTIVE: NUCLEAR POWER PLANTS**

Protecting people, property and the environment.

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