



September 2, 2005

Mr. Russell J. Arrighi
Senior Enforcement Specialist
United States Nuclear Regulatory Commission
Mail Stop 14 E1
Washington, DC 20555

Re: Williams Power Corporation and the NRC, 05-015

Dear Russell:

Again, we want to express our appreciation to you, Mr. Johnson, and other representatives of the Office of Enforcement for the courtesy and considerations shown to Williams during our recent meeting. As we explained at that meeting, Williams has taken a number of steps to enhance awareness of and compliance with its Safety Conscience Work Environment ("SCWE") program at licensed facilities. Additionally, Williams has agreed to take additional actions in order to further enhance SCWE.

The additional actions that Williams has either already begun implementation or which will take place in the future include:

- (1) Williams will broadly communicate the false statement issue which arose at the pre-decisional enforcement conference, with emphasis on the consequences for the involved supervisor who made the false statement to the Commission, throughout the organization.
- (2) Williams will modify its existing Ethics Policy to include an explicit reference to the necessity for complete and candid communications with government agencies.
- (3) The revised Ethics Policy will be incorporated into all future SCWE training.
- (4) The Williams General Counsel will conduct a comprehensive review of industry SCWE "best practices," and compare these practices with the existing Williams program in order to ensure that the Williams program incorporates industry trends and developments.
- (5) Williams will continue its existing SCWE training program and will target all Williams supervisory and management level employees, involved in nuclear work. The training program will incorporate both 10 CFR 50.5

and 10 CFR 50.7 awareness. Additionally, Williams will ensure that on-site employees are provided SCWE training either by the licensee or from the Williams site project manager upon badging at a licensed facility.

- (6) Williams will engage an independent auditor to perform an audit of Williams SCWE training within 12 months of issuance of the Confirmatory Order and every year thereafter for a total of three years in order to ensure the effectiveness of the SCWE program. At the conclusion of the three year independent audit cycle, Williams will institute internal audits, as described in item #7, below.
- (7) Williams internal auditing function will conduct annual audits of the Williams SCWE training program in order to ensure and verify that all Williams supervisory personnel and contractor employees receive and acknowledge SCWE, 10 CFR 50.5 and 10 CFR 50.7 training.
- (8) Williams will ensure that the results of the audit are provided to senior Williams management for appropriate action, and that the results of both the independent audit and subsequent Williams analysis and/or actions are available to the Commission for review. Towards this end, Williams will notify the Commission when the audit and management response are complete and documented.
- (9) Williams will designate a manager whose responsibilities include overall administration of the SCWE program. This manager will be responsible for ensuring that the program is being communicated, that the program is up-to-date and incorporates best practices, that the audits described above take place as scheduled, for communication of audit results to senior management, and for appropriate follow-up and corrective actions based upon audit findings. This manager will report directly to the Williams president for these SCWE activities.
- (10) The Williams General Counsel will review employment practices as they relate to SCWE policy in order to ensure that all Williams employment practices are consistent with 10 CFR 50.7.
- (11) Williams will modify its performance appraisal system to ensure that the performance appraisal for Williams site supervisors/project managers at licensed facilities include a rating factor that addresses implementation of the SCWE program.



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We trust that the commitments set forth above accurately reflect the agreements reached at our meeting. We understand and acknowledge that these commitments will be incorporated into a Confirmatory Order issued by the Commission and that the Commission will issue an appropriate press release relating to that Order.

I want to take this opportunity to describe to you certain changes in the Williams Group International corporate structure which have occurred during the pendency of this matter. Be advised that Williams Power Corp. changed its name to Williams Service Group, Inc. in October 2001. In December 2003, Williams Service Group, Inc. elected to become a limited liability company known as Williams Service Group, LLC. Thus, Williams Service Group, LLC is the appropriate successor in interest to Williams Power Corp.

In addition, in April 2005, Williams Service Group, LLC transferred and conveyed its contractual obligations relating to the services performed for licensees to Williams Industrial Services Group, LLC and its affiliates. Attached hereto is a letter from Williams Industrial Service Group recognizing the obligations itemized above and evidencing their commitment to meet these requirements.

As always, please let me know if you have any additional questions or if we can provide any additional information.

Very truly yours,
WILLIAMS SERVICE GROUP, LLC
(f/k/a Williams Power Corp.)



David K. Baxter
Secretary and General Counsel

cc: V. R. Williams
C. W. Whitney
W. H. Johnson



Williams Industrial Services Group, L.L.C.



A Global Power Equipment Group Company

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United States Nuclear Regulatory Commission
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Washington, DC 20555

Re: Williams Power Corporation and the NRC

Dear Mr. Arrighi,

As stated in Mr. Baxter's letter to you dated September 2, 2005, Williams Industrial Services Group, LLC and its subsidiaries (Williams Group) have assumed the contractual obligations of Williams Service Group, LLC relating to the services performed for licensees of nuclear power plants.

The Williams Group companies fully recognize and understand the obligations set forth in Mr. Baxter's letter, and we are fully committed to meet those obligations.

Please feel free to contact me, or Mr. Doug Page, President of Williams Specialty Services, LLC, at any time concerning any of these issues.

Sincerely,

Luther C. Daniels, Jr.
President