



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PENNSYLVANIA 19406-2713

October 21, 2013

Docket No. 03037850
Control No. 581620

License No. 20-31340-01

Mark O. Somerville, Ph.D., CHP, REA
Radiation Safety Officer
CB&I Federal Services LLC
(formerly Shaw Environmental & Infrastructure Inc.)
150 Royall Street
Canton, MA 02021

SUBJECT: CB&I FEDERAL SERVICES LLC, REQUEST FOR ADDITIONAL INFORMATION
CONCERNING APPLICATION FOR AMENDMENT TO LICENSE, CONTROL
NO. 581620

Dear Dr. Somerville:

This is in reference to your letter dated August 15, 2013 (ML13241A162) requesting to amend Nuclear Regulatory Commission License No. 20-31340-01. In order to continue our review, we need the following additional information:

1. Your letter dated August 15, 2013 should have been signed by a management representative rather than yourself. Please submit a letter signed by a management representative indicating that management has reviewed the amendment request and concurs in the statements and representations contained therein. Note also that a management representative should sign all future correspondence that requests a change in your license.
2. In the enclosure to your letter dated September 28, 2012 (ML12279A149), you described the change of ownership and noted that there would not be a company name change. In your letter dated August 15, 2013, you informed the NRC that the new name of the company is CB&I Federal Services LLC.
 - a. Provide the name, title, business telephone number, business facsimile number and business email address for your management representative.
 - b. Please provide an organizational chart depicting management structure, reporting paths, and flow of authority.
 - c. Indicate if the same licensee, under a different name (CB&I Federal Services LLC), still controls licensed activity and if the licensee's Parent company has or has not changed. If the Parent company has not changed, then this does not constitute a change of control as to Parent and Licensee. Appendix D from NUREG-1556, Volume 15 "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About

Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Material Licenses” provides additional guidance on this matter that may be helpful in your response.

- d. Indicate if this company name change is a change of control. If so, we are required to ask the following:
 - i. Provide a complete description of the transaction (transfer of stocks or assets, or merger).
 - ii. Indicate whether the name has changed and include the new name. Include the name and telephone number of a licensee contact who NRC may contact if more information is needed.
 - iii. Describe any changes in personnel or duties that relate to the licensed program. Include training and experience for any new personnel.
 - iv. Describe any changes in the organization, location, facilities, equipment or procedures that relate to the licensed program.
 - v. Describe the status of the surveillance program (surveys, wipe tests, quality control) at the present time and the expected status at the time that control is to be transferred.
 - vi. Confirm that all records concerning the safe and effective decommissioning of the facility will be transferred to the transferee or to NRC, as appropriate. These records include documentation of surveys of ambient radiation levels and fixed and/or removable contamination, including methods and sensitivity.
 - vii. Confirm that the transferee will abide by all constraints, conditions, requirements and commitments of the transferor or that the transferee will submit a complete description of the proposed licensed program.
 - viii. If your license requires financial assurance for decommissioning, you will need to address changes to financial assurance for name changes and/or change in ownership (control). If your company's name is changing and there is no change of ownership, you will need to amend your financial assurance instruments and supporting documents to address the change in name. If there has been a change of ownership (control), the transferee must submit new financial assurance in accordance with Chapter 4 to Volume 3 of NUREG-1757, “Consolidated NMSS Decommissioning Guidance.”

3. On September 17, 2013 the issued a press release titled: "NRC and Chicago Bridge & Iron Agree on Measures to Improve Safety –Conscious Work Environment." The organization chart included in your letter dated September 28, 2012 identifies Chicago Bridge & Iron. The NRC's Safety Culture Policy Statement became effective in June 2011. While a policy statement and not a regulation, it sets forth the agency's *expectations* for individuals and organizations to establish and maintain a positive safety culture. You can access the policy statement and supporting material that may benefit your organization on NRC's safety culture Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>. We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities. Section 5.6 from NUREG-1556, Volume 15 "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Material Licenses" requests a description of action to be taken to resolve open inspection and enforcement issues. Please provide this description.

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Nuclear Materials; Medical, Academic, and Industrial Uses of Nuclear Material**; then **Regulations, Guidance, and Communications**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 7:00 a.m. to 6:30 p.m. EST, Monday through Friday (except Federal holidays).

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 581620. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5251.

If we do not receive a reply from you within 30 calendar days from the date of this letter, we will assume that you do not wish to pursue your application.

Sincerely,

Kathy Modes

Kathy Modes
Senior Health Physicist
Decommissioning Branch
Division of Nuclear Materials Safety

cc:
Claire Doherty, Health Physicist

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