

**From:** [Arrighi, Russell](#)  
**To:** [Hasan, Nasreen](#)  
**Cc:** [Beckford, Kaydian](#)  
**Subject:** FW: CB&I's Nuclear Safety Culture  
**Date:** Monday, November 18, 2013 10:55:28 AM  
**Attachments:** [image001.png](#)

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Nasreen,

**This needs to be put in ADAMS. I will give you the 665P shortly.**

Russ

**From:** Stevens, Ronald J [<mailto:ronald.stevens@cbi.com>]  
**Sent:** Thursday, November 14, 2013 5:58 PM  
**To:** Zimmerman, Roy  
**Cc:** Barton, Virgil; Lyash, Jeff  
**Subject:** FW: CB&I's Nuclear Safety Culture

Roy,

**Per your request, below is the communication that was sent out earlier this afternoon. I have already received confirmation from several of our locations that the posting is taking place.**

**Please let me know if you have any questions.**

**Thank you.**

Ron

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**From:** Communications  
**Sent:** Thursday, November 14, 2013 2:56 PM  
**Subject:** CB&I's Nuclear Safety Culture



## CB&I Employee Bulletin

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Nov. 14, 2013

To CB&I Employees Who Work in Nuclear-Related Activities:

### **CB&I's Nuclear Safety Culture**

CB&I places a high priority on having a robust nuclear safety culture in all nuclear-related activities, from new construction to maintenance to decommissioning. This means emphasizing nuclear safety over competing goals to ensure the protection of the public and the environment and having a workplace where workers are free to raise concerns or to stop work without fear of retaliation. It is not simply a regulatory expectation, but the right way to do business.

In an April 18, 2013, letter, the U.S. Nuclear Regulatory Commission (NRC) concluded that some Lake Charles employees had the perception that they were not free to raise nuclear safety concerns using all available avenues, and, as a result, the NRC determined that a chilled work environment existed at the facility. Regarding a separate matter, the NRC issued a notice of violation and proposed imposition of penalties related to an apparent violation of 10 CFR 52.5, which prohibits discrimination against employees who engage in certain protected activities such as raising nuclear safety or quality concerns. CB&I entered into an agreement with the NRC resolving the alleged discrimination claim. As part of this agreement, the NRC withdrew the notice of violation and penalties. The NRC issued a confirmatory order to CB&I that details our agreement with the NRC to further enhance our nuclear safety culture and safety conscious work

environment.

We have learned that improvement in our nuclear safety environment is necessary, and we will implement a number of initiatives, including the following:

- Refreshing and issuing company policies and guidance on establishing and maintaining a healthy nuclear safety culture
- Revising the company Code of Conduct to clearly indicate an employee's right to raise a nuclear safety or quality concern to CB&I, the NRC and Congress or to engage in any other type of protected activity without being subject to disciplinary action or retaliation
- Training all employees who engage in work associated with NRC-regulated activities on nuclear safety culture and related issues
- Centralizing our Employee Concerns Program
- Establishing a uniform Executive Review Board process across all NRC-regulated businesses, projects and sites
- Performing ongoing tailored safety culture assessments of our nuclear business activities

In the future, we will host all-hands meetings for employees working in nuclear-related activities to discuss these important matters and to answer any questions you may have.

While we have had our challenges in achieving and maintaining a robust nuclear safety culture, we are committed to ensuring every CB&I work site associated with NRC-regulated activities maintains an environment in which all workers understand the obligation to raise concerns and feel free to exercise this responsibility without fear of retaliation. I expect each employee to take personal responsibility for nuclear safety, to identify and report nuclear safety concerns and to use any of the available avenues for reporting those concerns.

Philip K. Asherman  
President and Chief Executive Officer

**Please post in a prominent area at project sites and facilities.**

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