



WECTEC LLC
128 South Tryon Street,
Suite 1000
Charlotte, NC 28202

August 05, 2016

To: Patricia Holahan, Director Office of Enforcement

Cc: Lisamarie Jariel, Laura Dudes, Michael Cheok, and Jennifer Uhle

From: David Durham, President WECTEC LLC

A handwritten signature in blue ink that reads "David C. Durham".

Subject: WECTEC Commitment for Ongoing Compliance to Confirmatory Order EA-12-189 and EA-13-196

Background:

On September 25, 2014, the NRC issued the subject Confirmatory Order ("CO") to Chicago Bridge & Iron Company ("CB&I"). On December 31, 2015, CB&I sold to Westinghouse Electric Company LLC ("WEC") certain entities that were subject to the CO. These entities are part of a new company, WECTEC Global Project Services Inc. ("WECTEC"), formed by WEC and which includes personnel at the VC Summer Nuclear Project, the Vogtle Nuclear Project and support staff located in Charlotte, NC and Canton, MA offices.

Discussion:

The purpose of this letter is to provide a formal commitment to the NRC that WECTEC will maintain and adhere to the programs and processes established per the CO applicable to WECTEC and as clarified in this letter. WECTEC will also meet applicable outstanding CO requirements, such as required refresher training.

During the acquisition, WEC ensured that objective evidence of the completion of CO requirements by CB&I would be retained by WEC/WECTEC. WEC/WECTEC also assured that all relevant CB&I Nuclear Safety Culture ("NSC") procedures, policies, and training materials needed to support ongoing compliance were acquired.

Post-acquisition, the retained, legacy CB&I items were converted into WECTEC policies, procedures and organizational structure. During this conversion, WECTEC included lessons learned from past implementation efforts, learnings from nuclear industry benchmarking, and feedback from external nuclear safety culture consultant activities. WECTEC updated its CO objective evidence files to document the manner in which each CO required element was incorporated into WECTEC policies, programs and procedures.

Post-acquisition activities were undertaken to ensure that WEC, WECTEC, and new construction contractor leaders at the two project sites understood the background and requirements of the CO and accompanying requirements and commitments.

The WEC/WECTEC organizational structure differs from the previous CB&I organizational structure. These differences are as follows:

- The WECTEC Employee Concerns Program (“ECP”) reports to the WEC legal department. This follows the existing WEC reporting structure for employee concerns, and ensures the independence of ECP from other WECTEC and construction project activities. Post-acquisition, there has been no drop-off in the utilization of WECTEC ECP. On the contrary, the WECTEC ECP has seen increased utilization in the months since the acquisition. A continued strong working relationship exists between the ECP organization and the WEC Global Nuclear Safety director to ensure NSC objectives are met.
- The WECTEC Nuclear Safety organization has been integrated with the existing WEC Nuclear Safety organization. The Vice President Nuclear Safety role (Nuclear Safety Officer) identified in the CO has been replaced by the WEC Director Global Nuclear Safety Culture. This position reports to the WEC Senior Vice President of Quality and EHS.
- The Executive Nuclear Safety Council, established to provide oversight advised by external consultants, has been replaced by the WEC Nuclear Safety Review Board.

These organizational and oversight changes to integrate WECTEC into the larger WEC organization have no adverse impact to the effectiveness of the day-to-day execution of CO program requirements.

WECTEC recently transitioned the CB&I Corrective Action Program to the WEC Corrective Action, Prevention, and Learning system (“CAPAL”). A post-transition effectiveness review identified improvements opportunities in the clarity of requirements for screening of deliberate misconduct events as significant conditions adverse to quality and for trending NSC traits. These improvements were entered into the CAPAL system to document the condition and track completion of corrective actions.

WECTEC intends to revise the NSC training material originally developed for employees and supervisors in accordance with the CO. The revised training material will continue to comply with and fully implement the content requirements delineated in the CO. The revisions will restructure training content to convey the material in a manner that is more aligned to the working conditions that exist in a construction environment. These revisions will be completed by no later than the fourth quarter of 2016.

Recognizing that the AP1000 construction environment is unique and different from the commercial nuclear operating environment, WEC and WECTEC remain committed to maintaining a strong and healthy nuclear safety culture.

If you have any questions regarding this letter, please contact Steve Hamilton – Senior Vice President Quality and EHS or Ed Wills – Director Global Nuclear Safety Culture.