



August 4, 2017

Patricia K. Holahan
Director, Office of Enforcement
U.S. Nuclear Regulatory Commission (NRC)
Washington, DC 20555-0001

SUBJECT: ADDITIONAL REQUESTED INFORMATION IN RESPONSE TO REQUEST FOR COMPLIANCE REVIEW OF CONFIRMATORY ORDER EA-13-196 ISSUED TO CHICAGO BRIDGE & IRON COMPANY ON SEPTEMBER 25, 2014 - Docket Numbers 99901432 and 99901425

Dear Ms. Holahan,

This letter provides the additional requested information for the NRC's clarification of understanding of CB&I's current involvement in NRC-regulated activities. Specifically, the information concerns work at Lake Charles, LA; Laurens, SC and the Vogtle and V.C. Summer Nuclear construction sites.

- The CB&I Lake Charles, LA facility **completed** all NRC regulated work activities in December, 2016 and is currently being utilized to execute commercial work activities unrelated to any nuclear facilities. There are currently no plans for the return of any NRC regulated work activities to this facility.
- The CB&I Laurens, SC facility continues to fabricate ASME III piping and components for the Vogtle units. This NRC regulated work is anticipated to continue through Q1 of 2018. These work activities are currently supported by approximately 82 personnel; however, it is expected the workforce to decline as the fabrication backlog reduces.
- CB&I Services continues in the construction of Containment Vessels and Shield Wall Erection onsite for Vogtle Units #3 and #4. Construction efforts at the V.C. Summer site have been suspended indefinitely by the client. The NRC regulated work at Vogtle will continue until 2022. Currently the Vogtle site utilizes 217 employees to execute CB&I's current scopes of work. There are an additional 18 personnel supporting the Vogtle site in CB&I's Plainfield, IL office.
- CB&I's NSC management staff supports the necessary training and maintenance training of all personnel involved in NRC regulated work activities. This same staff supports interactions with any Concerned Individuals or concerns identified through the Employee Concerns Program. The NSC staff collects, analyzes data and prepares for the NSC quarterly monitoring panel reviews, as well as schedules and leads these reviews. There are two separate meetings, one for the CB&I Laurens facility and another that includes the CB&I Vogtle site and the CB&I Plainfield office. The NSC staff has regularly scheduled NSC/ECP site visits with interactions with our workforce, site management and the clients' ECP organization.

CB&I continues to believe it is appropriate to request closure or to have the order rescinded given CB&I has addressed the core issues underlying the CO, the significant reductions in CB&I's work force involved in NRC-regulated work, as well as, a greatly reduced incidence of NSC and SCWE concerns, and completion of CB&I's NRC-regulated work at Lake Charles. Our NSC program requirements have been incorporated into our CB&I management system. Additionally, there are discussions to execute the Vogtle new builds



under the owner's NSC and ECP programs which will provide difficulties in CB&I solely meeting all the CO requirements. This combined with over 26 NRC inspections since 2011 on CB&I work activities at V.C. Summer and Vogtle with NO FINDINGS identified, provides additional evidence of CB&I's commitment to meet all NRC regulatory requirements.

It is CB&I's understanding the above information will assist the NRC in determining whether additional reviews of CB&I's implementation of Order EA-13-196 is warranted. Additionally, CB&I understands this additional information may be used to relax or rescind any of the Order's conditions. CB&I would offer Attachment 1 as additional evidence of the actions taken to address the various conditions of the Order.

Please contact Rodney Whitley at (803) 522-3993 or Brett McCreary at (706) 726-5148, or via electronic mail at Rodney.E.Whitley@cbi.com or Brett.McCreary@cbi.com if you have any questions or need additional assistance regarding this matter.

Sincerely,

A handwritten signature in black ink that reads "Adam W. Mohr". The signature is written in a cursive, flowing style.

Adam W. Mohr
Group Vice President, CB&I Fabrication Services
Chicago Bridge and Iron
One CB&I Plaza
2103 Research Drive
The Woodlands, TX 77380

Attachment 1: CB&I EA-13-196 Compliance Evidence Matrix



**NRC Confirmatory Order EA-13-196
Compliance Evidence Matrix**

Chicago Bridge and Iron (CB&I) has stored Confirmatory Order (CO) compliance evidence on a secured website. Access to this website will be granted to Nuclear Regulatory Commission (NRC) inspectors once they have been assigned for review.

To gain access, please email Brett McCreary, Nuclear Safety Culture Program Manager, at Brett.McCreary@cbi.com. Brett will facilitate granting access from CB&I's Information Technology team and notify inspectors once access is granted.

Once access is granted, all folders can be accessed by clicking [here](#).

- Evidence specific to action A – Communication – can be accessed by clicking [here](#).
- Evidence specific to action B – Training – can be accessed by clicking [here](#).
- Evidence specific to action C – Work Processes – can be accessed by clicking [here](#).
- Evidence specific to action D – Assess and Monitor NSC and SCWE – can be accessed by clicking [here](#).
- Evidence specific to action E – Other – can be accessed by clicking [here](#).

Additional links associated with specific CO actions are provided in the following table.



Confirmatory Order EA-13-196 Compliance Summary

Sect	#	Sub	Action	Objective Evidence
A	1	a	Written Communication	Recorded in NRC Inspection Report No. 99901425/2015-201. Click to review written communication from Chief Executive Officer.
A	1	b	Posting of Written Communication	Click to review samples confirming display of written communication.
A	1	c	All Hands Meetings	Click to view sign-in sheets and presentation slides.
A	2	a	Nuclear Safety Culture (NSC) Policies/Procedures Provided to NRC	Click to view copies of material submitted.
A	2	b	Maintain Nuclear Safety and NSC Policies, Guidance and Related Materials	Recorded in NRC Inspection Report No. 99901425/2015-201.
A	2	c	Nuclear Safety and NSC Policies, Guidance and Related Materials: Distribute copies and inform employees where materials are located. Provide during orientation.	Recorded in NRC Inspection Report No. 99901425/2015-201.
A	3	a	Share Experience/Insights	Recorded in NRC Inspection Report No. 99901425/2015-201.
A	3	b	RIC Panel Participation	Recorded in NRC Inspection Report No. 99901425/2015-201.
A	4	-	Lake Charles Periodic Reinforcement of Expectations	Click to view copies of sample communication.
B	1	a	NSC Training to Include Case Studies of Discriminatory Practices.	Recorded in NRC Inspection Report No. 99901425/2015-201.

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Sect	#	Sub	Action	Objective Evidence
B	1	b	NSC Training: Key Terms	Recorded in NRC Inspection Report No. 99901425/2015-201.
B	1	c	Develop/Revise ECP, NSC, Nuclear Safety Training for All CB&I Employees	Recorded in NRC Inspection Report No. 99901425/2015-201.
B	1	d	Include CAP in Employee Training	Recorded in NRC Inspection Report No. 99901425/2015-201.
B	1	e	NSC Training - Willful Violations (include case studies)	Recorded in NRC Inspection Report No. 99901425/2015-201.
B	1	f	Orientation includes Deliberate Misconduct (include 10 CFR 52.4 and 10 CFR Part 50 Appendix B)	Recorded in NRC Inspection Report No. 99901425/2015-201.
B	1	g	Training Material Available to NRC upon Request	Click to view current training material.
B	2	-	Pilot Training	Recorded in NRC Inspection Report No. 99901425/2015-201.
B	2	a	Commence Supervisor Training	Recorded in NRC Inspection Report No. 99901425/2015-201.
B	2	b	Complete Supervisor Training	Recorded in NRC Inspection Report No. 99901425/2015-201.
B	2	ci	Initiate Supervisor Refresher Training (instructor led after 2 years, CBT after 4 years)	Click to view refresher training attendance records.
B	2	cii	Supervisory Training Computer-Based	N/A: scheduled to begin in 2018.
B	2	d	Record Retention for Supervisors (Training records will be made available to the NRC upon request)	Recorded in NRC Inspection Report No. 99901425/2015-201.
B	3	-	Instructor led training twice per year for new supervisors.	Recorded in NRC Inspection Report No. 99901425/2015-201.
B	4	a	Non-Supervisor Training Six Months after Supervisor Training	Recorded in NRC Inspection Report No. 99901425/2015-201.

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Sect	#	Sub	Action	Objective Evidence
B	4	b	Complete Non-Supervisor Training	Recorded in NRC Inspection Report No. 99901425/2015-201.
B	4	c	Refresher Non-Supervisor Training Computer Based	Recorded in NRC Inspection Report No. 99901425/2015-201. Click to access computer-based training format.
B	4	d	Non-Supervisor Training Instructor Led for New Employees (part of orientation)	Recorded in NRC Inspection Report No. 99901425/2015-201.
B	4	e	Record Retention for Non-Supervisors	Recorded in NRC Inspection Report No. 99901425/2015-201.
B	5	-	Short-term Employee Training (Less than 90 Days): One Pager with key NSC terms	Recorded in NRC Inspection Report No. 99901425/2015-201.
C	1	a	Executive Review Board (ERB) Development – Benchmarking	Recorded in NRC Inspection Report No. 99901425/2015-201.
C	1	b	Executive Review Board Members (management, Legal, HR)	Click to view ERB membership rosters.
C	1	c	Executive Review Board Procedure, Decisions Available to NRC	Recorded in NRC Inspection Report No. 99901425/2015-201.
C	1	d	ERB Track Willful Violations and Deliberate Misconduct	Recorded in NRC Inspection Report No. 99901425/2015-201.
C	2	a	Employee Concerns Program (ECP) Development	Recorded in NRC Inspection Report No. 99901425/2015-201.
C	2	b	Employee Concerns Program Reporting	Recorded in NRC Inspection Report No. 99901425/2015-201.
C	2	c	Employee Concerns Program Training to ECP personnel	Click to view ECP staff qualifications.

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Sect	#	Sub	Action	Objective Evidence
C	2	d	ECP Effectiveness, Assessments: include willful violations and deliberate misconduct	Quarterly NSCMP reports
C	3	-	Supervisor Performance Appraisal	Click to view appraisal form.
C	4	-	Corrective Action Program Trending: Establish trending process, where applicable	Click to view trending information.
C	5	-	ECP Exit Interview/Survey (employee participation, actions available to NRC)	Recorded in NRC Inspection Report No. 99901425/2015-201. Click to view exit survey information.
C	6	-	Anonymous Reporting Services	Recorded in NRC Inspection Report No. 99901425/2015-201.
C	7	a	Nuclear Safety Culture Oversight: Assess twice per year with external consultant	Click to view nuclear safety culture monitoring panel (NSCMP) information.
C	7	b	Nuclear Safety Culture Oversight: Benchmarking	Recorded in NRC Inspection Report No. 99901425/2015-201.
C	7	c	Nuclear Safety Culture Oversight: directed by NSO	Recorded in NRC Inspection Report No. 99901425/2015-201. Click to view NSCMP oversight information.
C	7	d	Tracking Willful Violations and Deliberate Misconduct	Recorded in NRC Inspection Report No. 99901425/2015-201.
C	8	-	Enter Chilling Effect Letter Conditions into Corrective Action Program (CAP)	Recorded in NRC Inspection Report No. 99901425/2015-201.
C	9	-	Revise CAP Guidance	Recorded in NRC Inspection Report No. 99901425/2015-201.
C	10	-	Revise CB&I Procedure Use and Adherence	Click to view procedure.
D	1	-	Company Nuclear Safety Officer (NSO)	Click to view NSO information.
D	2	-	NSC Survey Development: Third Party Consultant	Click to view consultant information. Click to view 2014 survey results.

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Sect	#	Sub	Action	Objective Evidence
D	2	a	NSC Surveys: Every Two Years	Consultant reports not available as of Oct. 13, 2016. Click to view 2016 survey copies.
D	2	b	NSC Surveys: Provide results to NRC upon request	For 2014: Recorded in NRC Inspection Report No. 99901425/2015-201. 2016 consultant reports not available as of Oct. 13, 2016.
D	2	c	NSC Surveys: Communicate results to employees within 3 months	For 2014: Recorded in NRC Inspection Report No. 99901425/2015-201. Click to view 2014 information. 2016 consultant reports not available as of Oct. 13, 2016
D	2	d	Will Violations/Deliberate Misconduct Survey Statements	Click to view survey templates.
D	3	a	Chilling Effect Letter assessment: Independent Focus	Recorded in NRC Inspection Report No. 99901425/2015-201.
D	3	b	Chilling Effect Letter assessment: Evaluate Independent Focus	Recorded in NRC Inspection Report No. 99901425/2015-201.
D	4	-	Review Independent Chilling Effects Letter Assessment	Recorded in NRC Inspection Report No. 99901425/2015-201.
E	1	-	Chilling Effects Conditions Entered into Corrective Actions Program	Recorded in NRC Inspection Report No. 99901425/2015-201.
E	2	a	Revise Code of Conduct	Recorded in NRC Inspection Report No. 99901425/2015-201.
E	2	b	Include Code of Conduct in Training	Recorded in NRC Inspection Report No. 99901425/2015-201.