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17 May 2013

Glenn Tracy
Director, Office of New Reactors
MS T6F15
Washington, DC 20555-0001

Subject: Response to April 18, 2013, NRC Letter Regarding Chilled Work Environment at CB&I Lake Charles Fabrication Facility

Reference: Letter dated April 18, 2013, from Glenn M. Tracy, Director, Office of New Reactors, USNRC, to Philip K. Asherman, President and Chief Executive Officer, CB&I [Docket: 99901424]

Dear Mr. Tracy:

I am writing in response to your letter of April 18, 2013, regarding the NRC's concerns of a chilled work environment at CB&I's fabrication facility in Lake Charles, Louisiana. As we discussed in our phone call on April 18, we are fully committed to taking the right actions to correct this problem and are dedicated to ensuring we establish and maintain an appropriate safety culture at this facility, as well as with all the other nuclear activities conducted by CB&I. CB&I takes these concerns very seriously and the CB&I Board of Directors have been briefed regarding your letter.

The right of our employees to raise safety and quality concerns without fear of retaliation or other adverse actions is an unwavering expectation of our company. CB&I will not tolerate retaliation of any kind against any individual who raises concerns. We have provided multiple pathways for employees to address issues which include, but are not limited to, their supervisors or managers, the Corrective Action Program (CAP), site-specific Employee Concerns Programs, the Compliance Hotline, the NRC, and others.

CB&I recognizes that considerable work needs to be done to correct the culture at Lake Charles. In this letter and the attachments, we are detailing the steps being taken to ensure a safety conscious work environment is established and how we will monitor and report the progress. Additionally, we will establish a CB&I Nuclear Safety Officer to provide continuous oversight and to evaluate and monitor all CB&I nuclear sites to ensure a strong nuclear safety culture exists.

As you may know, the previous President of Shaw's Fabrication & Manufacturing (F&M) Group was not retained as an employee of CB&I. Luke Scorsone, who is the CB&I Executive Vice President and Group President of the Fabrication Services Operating Group, oversees the F&M business unit. The new President of the F&M Business Unit, Remi Bonnacaze, who reports to



Luke, was appointed to his position in February 2013. Luke's team has already conducted multiple all-hands meetings at the Lake Charles facility in which our expectation that safety and quality have priority over cost, production, and schedule were clearly communicated. The team discussed the importance of having a work environment where employees feel free to identify concerns, improvement opportunities, and differing opinions without fear of retaliation. Also it was made clear that retaliation against individuals who raise safety concerns will not be tolerated.

We also recognize that our corrective action program should be the primary means by which issues are identified and resolved. We are committed to ensuring that each employee is appropriately trained in the proper use of CAP, and also that each employee's confidence in the effectiveness of the CAP is restored.

Our leadership team is demonstrating to the workforce that the CB&I approach to addressing employee concerns is consistent with safety conscious work environment principals and practices. CB&I senior leadership will ensure this through coaching, training, and monitoring.

We are working with SCANA, Southern Nuclear Operating Company, and an independent consultant to conduct a thorough root cause analysis of the safety culture issues at Lake Charles. Based on the results of the analysis, we will evaluate the potential for these issues at other CB&I nuclear sites. We will be relentless in our efforts to ensure our employees can trust that their leadership will establish a robust and sustainable safety conscious work environment. Should our analysis reveal retaliation has occurred, management will take the appropriate personnel actions. In addition, we will keep you regularly informed of our progress. Within six months of this letter we plan another survey of our safety culture at CB&I Lake Charles and will provide you the results of that survey.

Attached is the information you requested in your April 18 communication. Attachment 1 and Attachment 2 address our immediate actions taken, and our plan going forward, respectively, to address the chilled work environment at our Lake Charles facility.

CB&I looks forward to engaging with you and your staff to ensure that our efforts are consistent with the expectations of the NRC. We understand the importance of creating and maintaining the appropriate safety conscious work environment at Lake Charles and other CB&I sites, and we welcome any observations you and your staff may have in review of our proposed actions.

We know we have a long path ahead of us, and we are committed to correcting the issues at Lake Charles and creating a safety conscious work environment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Philip K. Asherman', written over a large, stylized circular mark.

Philip K. Asherman
President & CEO
CB&I



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ATTACHMENT 1

**CB&I Response to NRC Letter dated April 18, 2013
Chilled Work Environment at CB&I Lake Charles Fabrication Facility**

CB&I takes very seriously the matters raised in the Nuclear Regulatory Commission's (NRC) letter dated April 18, 2013, regarding a chilled work environment at the Lake Charles fabrication facility. Since receiving the letter, we have reviewed the NRC's Policy Statement entitled "Freedom of Employees in the Nuclear Industry to Raise Safety Concerns without Fear of Retaliation" and RIS 05-018, "Guidance for Establishing and Maintaining a Safety Conscious Work Environment (SCWE).

CB&I has taken immediate actions as discussed below, and has planned additional actions as described in Attachment 2 to address the identified issues. We are vigorously implementing these actions and are committed to enhancing and maintaining a strong nuclear safety culture and safety conscious work environment.

Below are our responses to the specific requests. NRC text is in italics where it appears.



NRC Item 1

(1) Your action plans to address existing SCWE issues in order to improve the environment for raising concerns at CB&I. The plans must layout steps to ensure that individuals who are not satisfied when an issue is resolved are permitted to pursue the resolution of the concern through additional avenues without fear of retaliation. The action plans, at a minimum, should specifically address how to improve the avenues for raising safety and quality concerns. For example, discuss how the corrective action program can be better used by employees; how the employee concerns program can be promoted to facilitate its use by employees; and how employees will be advised that the NRC is available for workers when safety and quality issues arise. If further assessment of the SCWE is undertaken to validate present conditions, that assessment should be conducted by persons both independent of the chilled organization and knowledgeable and experienced in conducting such assessments. If individuals are interviewed as part of your review, your response should include the basis for determining that the number and cross section of individuals interviewed was appropriate to obtain the information necessary to fully evaluate the chilled work environment, and the interview questions used. The plans must also delineate the criteria for measuring the effectiveness of the action plan.

CB&I Response to Item 1

CB&I has taken the following actions to improve the environment for raising concerns at the CB&I Lake Charles facility.

Luke Scorsone, CB&I Corporate Executive Vice President and Group President of Fabrication Services operating group, and Remi Bonnecaze, CB&I President of Fabrication & Manufacturing who reports to Luke, conducted multiple all-hands meetings at the Lake Charles facility. In these meetings, they communicated CB&I's values of safety and quality. They discussed the need to create a work environment where employees feel free to identify concerns, offer improvement opportunities, and communicate differing opinions without fear of retaliation. It was made clear that retaliation against individuals who raise safety concerns will not be tolerated. They also reminded the workforce of the alternative methods available for resolving concerns which include, but are not limited to, the Employee Concerns Program, the CB&I Compliance Hotline, and the NRC.

Employee feedback was obtained during these meetings. Items raised were entered into the corrective action program and are being addressed.

The following bullets are some specific actions that have been addressed related to Item 1:

- Representatives from CB&I Corporate, CB&I Power, SCANA, and Southern Nuclear Operating Company have teamed with CB&I Lake Charles to establish this response.



- Safety conscious work environment (SCWE) banners and posters were developed and displayed throughout the Lake Charles facility. These materials clearly identify the avenues individuals can use to raise safety and quality concerns. Among the nine options for raising concerns identified on the posters are the Corrective Action Program (CAP), the Employee Concerns Program, and the NRC.
- We created a SCWE pamphlet that was handed out at the all-hands meetings discussed above. This pamphlet defines nuclear safety culture and SCWE, and it identifies how to report a concern and the avenues for reporting concerns. This pamphlet promotes discussing the concern with one's immediate supervisor, and it clearly identifies the Corrective Action Program, the Employee Concerns Program, and the NRC among other options for reporting concerns.
- We developed an action plan (see Attachment 2) that defines additional actions to be taken to improve the environment for raising concerns at the Lake Charles facility and to ensure that individuals who are not satisfied with the resolution of their concerns know the avenues available to resolve them.
- In an effort to regain employee trust, managers at the Lake Charles facility have been conducting small group meetings ("sensing sessions") where employees provided feedback and improvement suggestions. Issues identified during these sessions have been entered into the corrective action program as appropriate.
- We retained the services of a third-party behavioral consulting firm to provide coaching to key leaders on practices that will enhance trust and teamwork and will establish the foundation for the nuclear safety culture and SCWE.
- We initiated CR 2013-438 in the CB&I Lake Charles CAP to address the chilled work environment. It was screened as a Significance Level 1 (Significant Condition Adverse to Quality), and we started the formal root cause analysis. An independent consultant, who is serving as team lead, and representatives from SCANA and Southern Nuclear Operating Company are participating on the root cause analysis team with CB&I Lake Charles personnel.

CB&I recognizes the nuclear safety culture at Lake Charles does not meet management's expectations and needs to be improved. We will continue to use employee feedback and the results of future assessments and surveys to measure the health of the safety culture and safety conscious work environment, and to identify progress being made in improving the culture.

Attachment 2 describes the in-process and planned actions.



NRC Item 2

(2) Your plan to notify the workforce of the NRC identification of a chilled work environment, as described in this letter, and the NRC's increased focus in this area and intent to review your actions to address this concern. The plan should describe how CB&I will communicate the expectations and policies needed to maintain a safety conscious work environment to workers at CB&I. The specific CB&I expectations and policies should address, as appropriate, the elements of a SCWE described in the NRC's Policy Statement entitled, "Freedom of Employees in the Nuclear Industry to Raise Safety Concerns without Fear of Retaliation" and RIS 05-018, "Guidance for Establishing and Maintaining a Safety Conscious Work Environment." The Plan should describe the methods that will be undertaken to verify that all SMS and contract personnel are trained on these expectations and policies. Finally, the plan should include measures to assess the effectiveness of employee training and measures for monitoring the development and maintenance of a SCWE.

CB&I Response to Item 2

CB&I has taken the following actions to notify the workforce of the details of the NRC identification of a chilled work environment:

The Vice President of the Lake Charles facility, Kevin Walsh, and the President of Fabrication & Manufacturing business unit, Remi Bonnacaze, conducted a series of all-hands meetings at the Lake Charles facility to present the details of the NRC chilling effect letter. They emphasized the importance of the NRC letter, the NRC's increased focus on this area, and the NRC's intent to review our actions to address this concern. Key discussion points included:

- CB&I's Core Values
- Senior Management's expectations for the establishment of a Safety Conscious Work Environment with emphasis on listening and accepting concerns and process improvements from any employee ensuring they are not harassed, intimidated, retaliated or discriminated against
- Options for reporting safety and quality concerns

The SCWE pamphlet was handed out at these meetings. Attendance was documented and will be compared to the employee roster to ensure all personnel received the details of the NRC chilling effect letter.

Attachment 2 describes our plans to communicate the expectations and policies to the workforce to assess the effectiveness of employee training and to establish measures for monitoring the development and maintenance of a SCWE at the Lake Charles facility.

**NRC Item 3**

(3) A report on whether The Shaw Group Inc.'s corporate Employee Concerns Program was aware the Synergy report concluded that a chilled environment existed at SMS. Describe in detail what actions were taken by Shaw corporate officials to ensure SMS addressed the chilled environment in a timely manner. Describe what changes are being made by CB&I corporate officials to ensure the chilled work environment is remedied and future instances are addressed in a timely manner

CB&I Response to Item 3

While the Shaw Power Sector, Nuclear Division had an Employee Concerns Program (ECP) organization that provided functional direction to and oversight of the employee concerns organizations at their Nuclear Project sites, there was no similar corporate ECP organization to provide functional direction and oversight for employee concerns organizations at other locations such as the Lake Charles facility.

Following receipt of the final report dated March 27, 2012, from Synergy, an executive summary was presented on April 17, 2012, to executives from Shaw and SMS (Lake Charles). The Shaw executives refuted the report, citing lack of objective evidence. As a result, they discounted the report and its recommendations and failed to understand the significance of the report. Subsequently, no direction by Shaw executives was given to address the chilled environment.

Shaw senior management individuals at the time of the Synergy report are no longer in those positions.

Following receipt of the NRC's April 18, 2013 letter, the CB&I President and CEO designated the Corporate Executive Vice President and Group President of Fabrication Services Operating Group the responsibility to ensure the Lake Charles fabrication facility develop and maintain a positive nuclear safety culture and safety conscious work environment. The Corporate Executive Vice President and Group President of Fabrication and the CB&I President of Fabrication & Manufacturing went to the Lake Charles facility the week of April 28, 2013, making clear to the facility management team and the workforce their expectations for developing and maintaining a positive nuclear safety culture and safety conscious work environment. During all-hands meetings, they advised the workforce of the NRC's identification of the chilled work environment, reinforced everyone's right and responsibility to raise safety concerns, and reviewed the options for raising concerns, including raising a concern directly to the NRC at any time.

Prior to the Shaw acquisition on February 13, 2013, CB&I's involvement with V.C. Summer and Vogtle projects was limited to the fabrication of the containment vessels for both sites. An element of the related contracts was the agreement for CB&I to use the Shaw Group ECP for their employees at each job site. With the completion of the Shaw acquisition, CB&I is integrating the two companies' operating procedures. This integration will include a company-wide ECP available to all employees who are



participating in activities subject to the NRC's authority. This new ECP organization will be responsible for providing functional direction and oversight at our employee concerns organizations at locations such as the Lake Charles facility.

In order to emphasize the importance that we are placing on a robust nuclear safety culture throughout CB&I's nuclear activities, we are establishing the position of a company Nuclear Safety Officer. This position will be charged with developing and expanding our nuclear safety culture and SCWE activities, including policies, training, assessment, and oversight. As part of this effort, we will evaluate CB&I sites supporting nuclear activities to ensure a strong nuclear safety culture exists at each location.

Furthermore, we are mindful of the NRC's notice of violation (NOV) (Agencywide Document Access and Management System Accession No. ML 13050A597) related to employee discrimination at CB&I. As you requested, we have taken the matters discussed in the NOV into consideration in developing this response, and we are confident that many of the actions identified in Attachments 1 and 2 will improve our nuclear safety culture and our SCWE in order to eliminate the possibility of employee discrimination at CB&I. However, we are also fully aware that through our internal activities, as well as interactions with the NRC, additional actions may be developed which would augment or complement the actions contained in Attachments 1 and 2.

Attachment 2 identifies the actions to communicate the Synergy report results to the Lake Charles workforce, and it includes CB&I's commitment to implement a company-wide ECP and establish a position of a company Nuclear Safety Officer.



NRC Item 4

The NRC is also concerned that the chilled work environment has resulted in a number of quality concerns being referred to the NRC and bypassing the SMS established processes. The repetitive nature of the resulting inspection findings and substantiated allegations indicate SMS management has not implemented sufficient programmatic controls to ensure adequate quality in the following areas: 1) control of special processes; 2) inspections; 3) personnel training and qualification; 4) instructions, procedures and drawings; and 5) corrective action. The NRC is concerned about the lack of adequate implementation of the corrective action program at SMS, which is an important cornerstone of a safety conscious work environment. The NRC expects vendors to identify and correct problems affecting safety and quality of nuclear plant components. Therefore, your action plans should layout the steps to be taken to ensure these five areas of your quality program will be addressed to improve product quality for safety-related components.

CB&I Response to Item 4

CB&I recognizes the chilled work environment has resulted in a number of quality concerns referred to the NRC and bypassing the CB&I Lake Charles established processes. After the Shaw acquisition, CB&I Lake Charles instituted a complete reinspection of every sub-module to ensure quality for nuclear components. Additionally, source inspection activities are being performed by CB&I Power and licensee to provide assurance of product quality prior to shipment to the site. We will appoint an independent audit organization to perform a focused assessment to determine if effective programmatic controls are in place at CB&I Lake Charles in the five specific areas identified in your letter. We will evaluate the results of the assessment and take appropriate corrective actions to improve product quality for safety-related components delivered to the Summer and Vogtle sites.

Attachment 2 identifies the actions to be taken to address the five areas of the quality program and to improve product quality for safety-related components.



ATTACHMENT 2

CB&I Action Plan to Address NRC Letter dated April 18, 2013

Action Item	Milestone Date
NRC Item 1: The following actions will be taken to address existing SCWE issues in order to improve the environment for raising concerns at CB&I:	
1. Conduct a root cause analysis with the help of SCANA, SNC, and an independent consultant who will serve as team lead to identify the sources and extent of condition of the safety culture issues at the Lake Charles facility, and to help identify corrective actions to address the causes.	8/30/2013
2. Align nuclear safety culture and SCWE policy with CB&I nuclear safety culture addressing as appropriate the NRC's Policy Statement entitled "Freedom of Employees in the Nuclear Industry to Raise Safety Concerns without Fear of Retaliation" and RIS 05-018, "Guidance for Establishing and Maintaining a Safety Conscious Work Environment."	10/4/2013
3. Formally train CB&I Lake Charles managers, supervisors/foremen, and the workforce: <ul style="list-style-type: none">• CB&I expectations and policies regarding establishing and maintaining a positive nuclear safety culture and safety conscious work environment• CB&I expectations for use of the corrective action program• Avenues for reporting safety and quality concerns without fear of retaliation, particularly for those who are not satisfied when an issue is resolved	10/4/2013
4. Update the New Hire Orientation section on SCWE to emphasize nuclear safety culture, safety conscious work environment, use of the corrective action program for raising concerns, and the additional avenues for raising concerns.	10/4/2013
5. Begin utilizing the updated New Hire Orientation section on SCWE to the Lake Charles workforce. Measure effectiveness of Training through retention based testing.	10/21/2013
6. Establish a nuclear safety culture refresher course with input from 3rd party nuclear industry professional for managers and supervisors/foremen. Course will include sensitivity, communication, and coaching/mentoring training.	8/16/2013
7. Begin the refresher training to Lake Charles managers and supervisors/foremen. Measure effectiveness of Training through retention-based testing.	8/30/2013



Action Item	Milestone Date
8. Continue to conduct Human Performance Training for the Lake Charles workforce that educates the employees to identify error-likely situations and emphasizes the behaviors which, when implemented, minimize the frequency and severity of events.	12/13/2013
9. In regular staff meetings, pre-job briefings, etc.: <ul style="list-style-type: none">reinforce the avenues for raising concerns, such as the use of the CAP, the ECP, and the NRCreinforce to the workforce that there will be no retaliation for raising concernsreinforce to the workforce that our preferred method of raising concerns is between the concerned individual and his/her immediate supervisorThe Corporate Executive Vice President and Group President of Fabrication and Services Operating Group and the CB&I President of Fabrication & Manufacturing will conduct quarterly "All-Hands" meetings at the Lake Charles facilityContinue to demonstrate leadership commitments by actively engaging supervision/management in SCWE discussions and showing visible presence at the Lake Charles facility	On-going
10. Update our employee concerns program posters to promote the Employee Concerns Program as an avenue for raising concerns, as well as identifying alternate avenues for raising concerns.	7/31/2013
11. Develop and implement a process by which personnel departing CB&I Lake Charles participate in an Exit Interview/Survey with the Lake Charles Employee Concerns Program to facilitate identification of nuclear safety issues.	7/31/2013
12. Perform an independent review of the Lake Charles Employee Concerns Program investigations and responses to concerns in the last year to find any substandard concern responses, correct them and communicate specifically to the concern filer and generally to the employees.	10/31/2013
13. Establish Corrective Action Program (CAP) refresher training for employees on how to use the CAP to identify and document a concern, and utilize the system for problem Identification and resolution.	8/30/2013
14. Develop posters and signage that promote the use of Condition Reports (CRs) as an avenue for raising concerns and place them throughout the facility to reinforce the use of the corrective action program.	7/31/2013
15. Review and evaluate Human Resource (HR) policies, procedures, pay scales, and disciplinary practices. Update and make changes to be consistent with CB&I requirements. Clearly communicate to the employees through a handbook to maintain consistent standards as well as avenues to raise concerns.	6/28/2013



Action Item	Milestone Date
16. Proceduralize the Executive Review Board process currently in use at CB&I Lake Charles that prescribes the process for the review of adverse actions intended for employees. When developed and approved, provide awareness training for personnel at the appropriate levels.	8/30/2013
17. Engage an independent reviewer with extensive nuclear experience to evaluate the effectiveness of actions taken by CB&I Lake Charles to include actions related to the Root Cause Analysis and provide feedback to CB&I Corporate Executive Vice President and Group President of Fabrication Services Operating Group on a periodic basis.	9/27/2013
18. Develop criteria (e.g., RFIs from NRC, cross section of employees using CAP, etc.) to measure effectiveness of actions taken to improve the chilled environment.	7/31/2013
19. Establish a nuclear safety steering committee comprised of personnel from the licensee, personnel with extensive nuclear experience, and CB&I leadership. This committee will oversee CB&I Lake Charles' implementation of actions associated with this plan and future activities associated with enhancing and maintaining a strong nuclear safety culture and SCWE at CB&I Lake Charles.	8/30/2013
20. Plan to conduct a nuclear safety culture assessment to measure the health of the safety culture and safety conscious work environment. Ensure the assessment is conducted by persons who are independent of the chilled organization and knowledgeable and experienced in conducting such assessments. If individuals are interviewed as part of the assessment, document the interview questions used and that the basis to determine the number and cross section of individuals interviewed was appropriate to obtain the necessary information to fully evaluate the chilled work environment. Refer to NRC Item 3 below for actions to be taken to ensure results of the assessment are appropriately addressed.	10/31/2013
21. Conduct a follow-up nuclear safety culture assessment within one year following the date of the previous assessment (in Action 20 above) to measure the health of the safety culture and safety conscious work environment. Ensure the assessment is conducted by persons who are independent of the organization and knowledgeable and experienced in conducting such assessments. If individuals are interviewed as part of the assessment, document the interview questions used and that the basis for determining the number and cross section of individuals interviewed was appropriate to obtain the necessary information to fully evaluate the chilled work environment. Refer to NRC Item 3 below for actions to be taken to ensure results of the follow-up assessment are appropriately addressed.	10/31/2014
22. Evaluate all CB&I nuclear sites to ensure a strong nuclear safety culture exists at each location.	12/13/2013



Action Item	Milestone Date
23. Based on the root cause analysis' identified causes of safety culture issues at Lake Charles, evaluate the potential for these issues at other CB&I sites.	12/13/2013
NRC Item 2: The following actions will be taken to notify the workforce of the NRC identification of a chilled work environment as described in the NRC letter dated April 18, 2013:	
1. Develop and provide a briefing to the workforce notifying them of the actions being taken to address concerns identified in the NRC letter dated April 18, 2013. Attendance at these briefings will be mandatory and will be tracked with attendance sheets and compared against the employee roster to ensure members of the workforce have participated in the briefings.	6/14/2013
2. Develop and provide a briefing to communicate the expectations and policies to maintain a positive nuclear safety culture. Attendance at these briefings will be mandatory and will be tracked with attendance sheets and compared against the employee roster to ensure members of the workforce have participated in the briefings.	10/18/2013
3. Develop measures for monitoring the development and maintenance of a SCWE at the Lake Charles facility.	7/31/2013
4. Develop measures for monitoring the effectiveness of nuclear safety culture training at the Lake Charles facility.	7/31/2013
NRC Item 3: The following actions will be taken to ensure results of future nuclear safety culture surveys/assessments will be appropriately addressed:	
1. Review the February 2012 Synergy report and initiate CRs as appropriate.	7/19/2013
2. Communicate the results from the February 2012 Synergy report to the CB&I Lake Charles workforce.	7/31/2013
3. Review future nuclear safety culture assessments and initiate CRs as appropriate.	Upon results available
4. Communicate the results from future nuclear safety culture assessments to the CB&I Lake Charles workforce.	Upon results available
5. Provide results of future nuclear safety culture surveys/assessments to the CB&I President and Chief Executive Officer.	Upon results available
6. Ensure appropriate actions are taken to address results of future safety culture surveys/assessments.	Upon results available
7. Establish a CB&I Nuclear Safety Officer function to address company-wide nuclear safety culture and SCWE activities.	8/30/2013
8. Develop a company-wide ECP available to all employees participating in activities subject to NRC authority.	12/13/2013



Action Item	Milestone Date
NRC Item 4: The following actions will be taken to address the concern that the chilled work environment has resulted in a number of quality concerns being referred to the NRC and bypassing the Lake Charles established processes:	
1. Perform an independent focused assessment to determine if effective programmatic controls are in place at CB&I Lake Charles in the following five areas: <i>control of special processes; inspections; personnel training and qualification; instructions, procedures and drawings; and corrective action</i> . The assessment team will include, but will not be limited to, the licensees and CB&I Power.	8/30/2013
2. Evaluate assessment results of the independent focused assessment and take corrective actions as appropriate.	10/31/2013