

October 26, 2017

Kristine Svinicki
Chairman
Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Jeff Baran
Commissioner
Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Stephen Burns
Commissioner
Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Dear Chairman Svinicki and Commissioners Baran and Burns,

On behalf of the National Society of Professional Engineers and its more than 31,000 members, I urge the Nuclear Regulatory Commission to launch a thorough and complete investigation into events leading to the shutdown of construction of two nuclear reactors at the V.C. Summer site in South Carolina. NSPE is the only membership organization dedicated to ensuring the value of an engineering licensing system that protects the public health, safety, and welfare. NSPE strives to inform government agencies, industry, and the public about the critical importance of engineering licensure.

According to multiple sources, including media reports and statements by licensed professional engineers familiar with these events, Westinghouse Corporation and other contractors allegedly used unqualified and unlicensed individuals to design aspects of two nuclear reactors at the V.C. Summer site, placing the public health and safety at risk. Documents obtained by Charleston's *Post and Courier*, a Pulitzer Prize-winning newspaper, show that construction drawings used at the V.C. Summer site were not prepared, reviewed, or approved by licensed professional engineers. Internal published documents also allege a deliberate attempt by Westinghouse attorneys to narrowly interpret South Carolina professional engineering statutes to evade generally accepted design and construction practices.

According to reports, state and federal officials were not informed that unqualified and unlicensed workers were preparing design documents or conducting complex engineering calculations. These practices allegedly contributed to thousands of design revisions, construction setbacks, schedule changes, and the ultimate demise of the entire project.

We recognize that not all design elements of a nuclear facility (e.g., the nuclear island) currently require a professional engineer to be in responsible charge. However, in South

Carolina and most states, drawings for large building projects require the signature and seal of a licensed professional engineer, especially when that construction affects public health and safety.

A professional engineering license demonstrates a commitment to standards of engineering practice and ethical conduct by individuals possessing the necessary education, experience, and qualifications to provide critical engineering services to the public. A licensed professional engineer is required by law to adhere to statutory, regulatory, and ethical duties to bring the necessary technical competence to a project and to place the protection of the public health, safety, and welfare above all other considerations. If professional engineers violate regulatory or ethical requirements, they may be fined and have their license suspended or revoked by state engineering licensing boards. The public interest is best served when qualified individuals have not only proper technical expertise, but also a clear safety obligation that overrides all other considerations.

The NRC and NSPE share a common goal in protecting the public health, safety, and welfare by determining the causes of the failure of this project. NSPE therefore urges the NRC to immediately launch a full and complete investigation of this very serious matter.

Please contact Arielle Eiser, associate director of government relations and advocacy, at aeiser@nspe.org, with any comments or questions.

Sincerely,



Tom C. Roberts, P.E., F.NSPE
President, 2017–18