



January 30, 2017

FOIA/PA Officer
NNSA/Office of the General Counsel
P. O. Box 5400
Albuquerque, NM 87185-5400

**Request for CB&I AREVA MOX Services & CB&I Project Services Group Documents
on MOX Plant Rework Severity Levels, Especially as Such Documents Apply to Installation and/or
Billing Problems Caused by Superior Air Handling (HVAC Contractor)**

To Whom it Concerns:

This is a request filed under the Freedom of Information Act, as amended. Per the applicable law and Department of Energy regulations, I anticipate a response to this request within 20 days.

This request is being filed on behalf of Savannah River Site Watch (SRS Watch), a duly registered 501c(3) non-profit organization. While now working for SRS Watch, I have filed many FOIA requests with DOE on behalf of other non-profit organizations, including Friends of the Earth, the Alliance for Nuclear Accountability, Greenpeace and the Nuclear Control Institute.

I request that any fees that may be associated with this request be waived. The information obtained due to this request will be used solely for non-profit purposes in South Carolina and in the United States. The information will contribute to the public's understanding of the manner in which DOE conducts its business and will specifically be used to inform the public about DOE's plutonium fuel (MOX) project at SRS and the conduct of operations by both the National Nuclear Security Administration and MOX contractors. The information obtained via this request will be provided to not only the public but also to the SRS Citizens Advisory Board, the media and to members of Congress. Over the years, I have demonstrated an ability to use information gathered via FOIA requests in a manner so as to educate the public and elected officials about DOE and issues it is addressing. I request that the fee-waiver standard that has been applied to my requests in the past be applied to this request.

If any claim is made that any portion of any located documents are sensitive in nature or meet FOIA exclusions, I request that redacted copies of such documents be provided to me and that a full explanation be provided as to the reasons for any redactions. I further request that documents be provided to me as they become available and that the documents not be withheld until all pertinent documents are obtained.

This request concerning the manner of construction operations at the Mixed Oxide Fuel Fabrication Facility (MFF) at DOE's Savannah River Site applies to both DOE and National Nuclear Security Administration at SRS and elsewhere and any of their MOX contractors. In particular, this request



applies to MOX design and construction contractors CB&I AREVA MOX Services and CB&I Project Services Group and subcontractors such as Superior Air Handling (rumored to have badly botched the HVAC work in the MOX plant).

I hereby request:

- 1) Any documents, memos or emails formally issued to staff by CB&I AREVA MOX Services and/or CB&I Project Services Group and/or NNSA around the week of January 9, 2017 - and including all of December 2016 and January 2017 - concerning establishment of "severity levels" or "rework levels" - possibly designated levels I, II, II and IV - to address HVAC and other "rework" (reinstallation) problems at the Mixed Oxide Fuel Fabrication Facility at the Savannah River Site;
- 2) Any clarifying documents in Fiscal Year 2016 and Fiscal Year 2017 explaining how the severity of rework will be determined and how such rework will be billed, including any explanation of Severity Levels I, II, II and IV (or other such rework severity designations) for such rework and how to attribute costs of such work;
- 3) Documents explaining how potentially large rework costs attributed to Superior Air Handling, former and/or current HVAC contractor, might impact the company's financial viability or the viability of the parent company, Harris Companies, are also requested;
- 4) All documents in Fiscal Year 2016 and Fiscal Year 2017 by CB&I Project Services Group and/or CB&I AREVA MOX Services and/or NNSA on the installation problems caused by possibly shoddy work by Superior Air Handling and/or its subcontractors, including documents related to potentially fraudulent actions by Superior Air Handling concerning possibly questionable management by Superior Air Handling and/or its subcontractors of quality control documents and billing.
- 5) Any attachment to the above requested documents.

Thank you for processing this request in the time period mandated by law and regulation. If you have any questions about this request, please contact me at telephone 803-834-3084 or email at tomclements329@cs.com.

Sincerely,



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