

CINTAC

Civil Nuclear Trade Advisory Committee

May 4, 2016

The Honorable Penny Pritzker
Secretary
U.S. Department of Commerce
1401 Constitution Ave., NW
Washington, DC 20230

Dear Madame Secretary:

As the advisory committee comprised of America's leading nuclear energy companies and charged with counsel to the U.S. Department of Commerce on civil nuclear trade issues, the Civil Nuclear Trade Advisory Committee (CINTAC) is writing to express our strongest possible opposition to any action to eliminate the position of the Director of Nuclear Energy Policy at the National Security Council. We urge you to pursue every available avenue to preserve this critical energy and national security post.

The CINTAC's strong support for maintaining this position arises out of our members' institutional knowledge and experience working within the myriad of statutes and agencies regulating civil nuclear trade. Civil nuclear policy has a unique and critical requirement for federal coordination. U.S. nuclear trade is subject to unusually complex statutory and regulatory requirements, including bilateral cooperation agreements and an export-control regime that is administered by three departments and agencies. This is well-documented in the 2011 CINTAC letter to then Secretary Gary Locke (attached) that recommended the creation of the position.

The benefits of this position are clear in the tangible accomplishments achieved since its creation, within the context of changes that have made the regulatory environment even more complex. We can say without equivocation that this position has been consequential to significant results in terms of U.S. exports and jobs, enhanced U.S. government effectiveness, and strengthened national security. It is abundantly clear that abandoning this position, will be deleterious to the competitive position of U.S. companies engaged in global civil nuclear markets, undercut the effectiveness of U.S. government trade-support programs and weaken U.S. nuclear safety, security and nonproliferation objectives.

The elimination of this position is particularly troubling given the unprecedented challenge faced by the U.S. industry from state-owned competitors in the trillion-dollar international civil nuclear market. In addition to direct financial assistance, these state-owned competitors benefit from well-staffed coordinating and advocacy functions within the highest levels of government. Elimination of the only White House position committed to nuclear energy advocacy exacerbates this competitive disadvantage. Doing so is especially perplexing given the President's support

for nuclear energy in an “all of the above” approach to energy policy. As oft-noted by U.S. Secretary of Energy Ernest Moniz, nuclear energy expansion is absolutely critical to addressing global carbon emission reductions. This imperative is supported with the export of America's world-class nuclear technology, and the U.S. nuclear nonproliferation, safety, and security culture.

We trust you will convey to the President and your colleagues our deep concern regarding the potential termination of the position of Director of Nuclear Energy Policy, your support for the position and the serious consequences for U.S. exports, jobs and security interests.

Sincerely, and on behalf of the members of the CINTAC,



Chris Tye
Chair
Civil Nuclear Trade Advisory Committee



Gary Wolski
Vice Chair
Civil Nuclear Trade Advisory Committee

Cc: The Honorable John Kerry, U.S. Secretary of State
The Honorable Ernest Moniz, U.S. Secretary of Energy
The Honorable Susan Rice, Director, National Security Council

Attachment: June 2011 CINTAC Letter to Secretary Gary Locke Recommending the Creation of the NSC Director Position

Members of the CINTAC

Chris Tye, CINTAC Chair, & Senior Vice President, Nuclear Power, Fluor Enterprises, Inc.
Gary Wolski, CINTAC Vice Chair, & Vice President, Curtiss-Wright
John Bendo, Nuclear Energy Business Manager, ASME
David Blee, Executive Director, U.S. Nuclear Infrastructure Council
George Borovas, Partner, Shearman & Sterling
Omer F. Brown, II, Attorney-at-Law and Legal Counsel to Contractors International Group
on Nuclear Liability
Stephen J. Burdick, Partner, Morgan, Lewis & Bockius LLP
T. Graham Cable, Vice President, New Plant Offer Development, Nuclear Power Plants,
Westinghouse Electric Company
Kenneth Camplin, Vice President & Chief Business Development Officer, BWX Technologies
Lou Centofanti, Chairman, President and Chief Executive Officer, Perma-Fix Environmental
Services, Inc.
Christopher Colbert, Chief Strategy Officer, NuScale Power LLC
Colleen Deegan, Vice President, Bechtel Corporation
Thomas J. Dolan, Adjunct Professor, Department of Nuclear, Plasma and Radiological
Engineering, University of Illinois at Urbana-Champaign
Jack Edlow, President, Edlow International Company
Seth Grae, President & CEO, Lightbridge Corporation
Ralph L. Hunter, Jr., Chief Operating Officer, Exelon Nuclear Partners, LLC
Robert Kalantari, President and Chief Executive Officer, Engineering Planning
and Management, Inc.
Mary Holland Limbach, Managing Partner and President, Potomac Communications Group, Inc.
Daniel S. Lipman, Executive Director, Policy Development and Supplier Programs,
Nuclear Energy Institute
Neil J. Numark, President, NUMARK Associates, Inc.
Kenneth L. Peddicord, Director, Nuclear Power Institute, Texas A&M University
Craig H. Piercy, Washington Representative, American Nuclear Society
David Sledzik, Vice President, Product Management & International Nuclear Plant Projects, GE
Hitachi Nuclear Energy
Kevan Weaver, Director, Technology Integration, TerraPower, LLC
Mark Webber, Director, International Trade Policy for Government and Regulatory Affairs,
Lockheed Martin Corporation
Edward J. Wolbert, President and Chief Executive Officer, Transco Products, Inc.
William S. Woodward, Senior Vice President, International Projects, Holtec International
Todd Wright, Executive Vice President of Operations, Nuclear & Environment, AECOM

CINTAC

Civil Nuclear Trade Advisory Committee

June 16, 2011

The Honorable Gary Locke
Secretary
U.S. Department of Commerce
1401 Constitution Ave., NW
Washington, DC 20230

Dear Secretary Locke,

The Civil Nuclear Trade Advisory Committee (CINTAC) continues to be grateful for your strong support of the work of the committee, and of the U.S. civil nuclear industry. In September 2010, the first CINTAC provided you with a set of recommendations that included the establishment of an Office for Civilian Nuclear Policy within the National Security Council. We endorse those earlier recommendations, and would like to add specific recommendations concerning the role of this Office and its Director.

The United States has vital security, safety and economic interests in the rapidly expanding, world-wide development of nuclear power. These complex and complementary interests have recently been highlighted as a result of the events at the Fukushima Dai'ichi nuclear facility in Japan, as well as events in the Middle East and other regions. The United States pursues its interest in the international commercial nuclear sector through a complex set of rules, regulations and agreements administered by the Departments of Energy, Commerce and State, as well as the Nuclear Regulatory Commission.

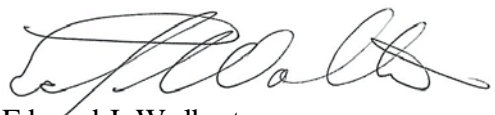
The success of the U.S. commercial nuclear industry, and its ability to compete in the international nuclear markets, is closely tied to how the government, through its agencies and departments, administers its interests. Due to the complexity of the policies that impact the civilian nuclear sector and the strategic importance of domestic civilian nuclear sector engagement in international nuclear development, it is recommended that an Office for Civilian Nuclear Policy be established within the National Security Council to:

- coordinate international aspects of U.S. civil nuclear policy including conducting an assessment of current policy alignment and its impact on international civilian nuclear engagement
- convene relevant federal agencies to ensure that they are well coordinated and aligned with regard to international civilian nuclear policy
- identify countries and regions in which expanded civilian nuclear engagement will:
 - enhance broader U.S. foreign policy goals
 - expand commercial opportunities for U.S. suppliers
- serve as the key interface and advocate for the commercial nuclear industry with regard to international treaties and agreements, Cabinet-level trade advocacy and international civil nuclear policy development
- coordinate policy with the National Security Council, the National Economic Council, the President's Export Promotion Cabinet and the Domestic Policy Council
- marshal USG programmatic support of U.S. industry commercial bids in strategic markets.

It is strongly recommended that the staff chosen to lead this effort should have an excellent knowledge of the international civilian nuclear industry and also be familiar with federal policies affecting the civilian nuclear sector.

On behalf of the CINTAC, I wish once more to express our sincere appreciation for your leadership in support of the nuclear industry.

Sincerely, and on behalf of the members of CINTAC,

A handwritten signature in black ink, appearing to read 'E. Wolbert', written in a cursive style.

Edward J. Wolbert
Chairman
Civil Nuclear Trade Advisory Committee
President & CEO - Transco Products Inc.

cc: Secretary Chu – U.S. Department of Energy
Secretary Clinton – U.S. Department of State
Members of the CINTAC

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Mr. Edward J. Wolbert, CINTAC Chair, President & CEO, Transco Products Inc.
Mr. Jeff Benjamin, CINTAC Vice-Chair, Principal, JB Global Energy, LLC
Mr. Scott Campbell, President, American Council on Global Nuclear Competitiveness
Dr. Tom Sanders, Past President, American Nuclear Society
Mr. John Bendo, Nuclear Energy Business Manager, American Society of Mechanical Engineers
Ms. Jane Howard, Manager, Global Market Access, Bechtel Corporation
Mr. Ganpat Mani, President, ConverDyn
Mr. Jack Edlow, President, Edlow International Company
Mr. Garry G. Young, Director, Nuclear Business Development, Entergy Nuclear
Mr. Donald Hoffman, President & CEO, EXCEL Services Corporation
Mr. Kevin Carrabine, Executive Director, Business Development, Exelon Nuclear Partners
Mr. B. Chris Tye, Senior Vice President, Nuclear, Fluor Corporation
Mr. David C. Durham, Senior Vice President, Global Sales & Marketing, GE Hitachi Nuclear Energy
Dr. Bill Woodward, Senior Vice President, Nuclear Projects, Holtec International Inc.
Mr. Christopher Guith, Vice President – Policy, Institute for 21st Century Energy at the U.S. Chamber of Commerce
Mr. Seth Grae, President & CEO, Lightbridge Corporation
Mr. Jason Leuck, Director, Technology Policy & Regulation, Lockheed Martin Corporation
Mr. Paul Murphy, Senior Attorney, Milbank, Tweed, Hadley & McCoy LLP
Mr. Jay Matthew Gutierrez, Partner, Nuclear Energy Practice, Morgan, Lewis & Bockius LLP
Ms. Carol Berrigan, Senior Director for Industry Infrastructure and Supply Chain, Nuclear Energy Institute
Mr. Bruce Landrey, Chief Marketing Officer, NuScale Power Inc.
Mr. James Goltz, President, Retech Systems LLC
Mr. Gerard Hanson, Director, Marketing and Sales, Rosemont Nuclear Instruments Inc.
Mr. Craig Hansen, Vice President, Nuclear Manufacturing, The Babcock & Wilcox Company
Mr. Lee Elder, Senior Vice President, Shaw Power, The Shaw Group Inc.
Mr. Frank Gilhooly, Director, Global Sales & Marketing, Tyco Flow Control
Dr. Vijay Sazawal, Director of Government Programs, USEC Inc.
Mr. Wallace Mays, President, W M Mining Company
Mr. Ahmad E. Amer, President, Amer Industrial Technologies, Inc.
Mr. Anthony Greco, Senior Vice President, Human Resources and Corporate Relations, Westinghouse Electric Company