



EXCEL SERVICES CORPORATION

Enhancing Safety and Security; Improving Efficiency and Performance;
and Reducing Operating Costs

NEW NUCLEAR BUILD [pages 5-13] **AND** **OPERATING NUCLEAR FLEET** [pages 14-25] **Support Services Overview**

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ABOUT EXCEL

EXCEL Services Corporation (hereinafter EXCEL) was founded in 1985 to provide specialized professional services to nuclear technology organizations in the areas of licensing, regulatory support, and operations. From a small, focused, specialty consulting company, EXCEL has evolved into a broad organization with the ability to supply the right professionals and the right management and approach for any task requiring the best in licensing, technical support, operations, or engineering expertise.

As such, EXCEL is now the premier licensing and engineering support company in the U.S. market. However, our focus has always been on (1) understanding the regulatory bases, licensing bases, and design bases, (2) ensuring that all work is conducted in full compliance with applicable Federal and State regulations, and (3) implementing improvements to the plant to enhance safety, improve performance, and reduce cost of operations.

EXCEL's core strength is its nuclear power plant licensing and regulatory experience. EXCEL supports and facilitates interactions between our U.S. customers and NRC headquarters staff for operating nuclear power plants and for new nuclear plants in design and/or under construction, or licensing in the U.S. and globally.

EXCEL supports our clients in New Nuclear Build in countries with nuclear experience and with no nuclear experience to ensure their program benefits from the global experience to date to make their new nuclear programs stay on budget and schedule.



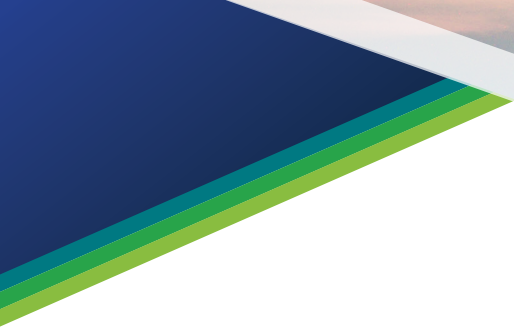
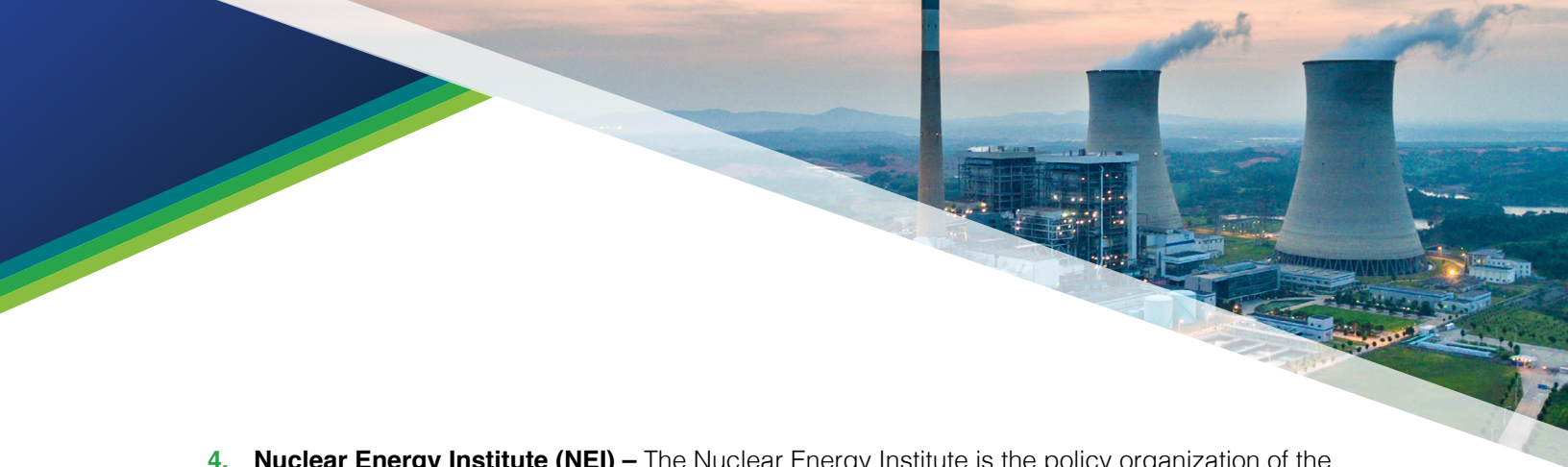


TECHNICAL AND MANAGEMENT Approach

EXCEL utilizes personnel that have extensive, current experience with advanced reactors, new construction issues, operational and engineering issues, decommissioning, and other activities related to managing and resolving first-of-a-kind, complex issues. Our personnel include former senior nuclear industry managers and NRC senior managers and staff with valuable boots on the ground experience.

EXCEL's President and CEO, and other EXCEL staff also maintain an active role in the following groups, which keeps EXCEL current in the latest nuclear industry activities, issues, and developments:

1. **American Nuclear Society (ANS)** – Past President and Fellow of ANS and a past member of the ANS's Board of Directors.
2. **Sensible Energy Matters to America (SEMA)** – Founder and President/CEO of SEMA, a 501(c)(3) organization founded to ensure the state and federal lawmakers appropriately value nuclear in the present and future energy mix and develop a sensible approach for the overall energy policy in the US. In this capacity, he has made presentations to the US Congress, US governmental agencies, and US energy producing organizations in coal, oil, gas, wind, solar, nuclear, hydro, biomass, and geothermal. He has also made presentations to the National Governors Association, and Republican and Democratic Governors Associations.
3. **United Nuclear Industry Alliance (UNIA)** – Founder and the President/CEO of UNIA. The UNIA is a Supply Chain business alliance, whose mission is to create innovative business relationships among its Members; create innovative business relationships between its Members and Utilities; facilitate effective, local, state and federal government support that reenergizes the U.S. Supply Chain community; and maximize Members' ability to compete in the nuclear industry domestically and internationally.

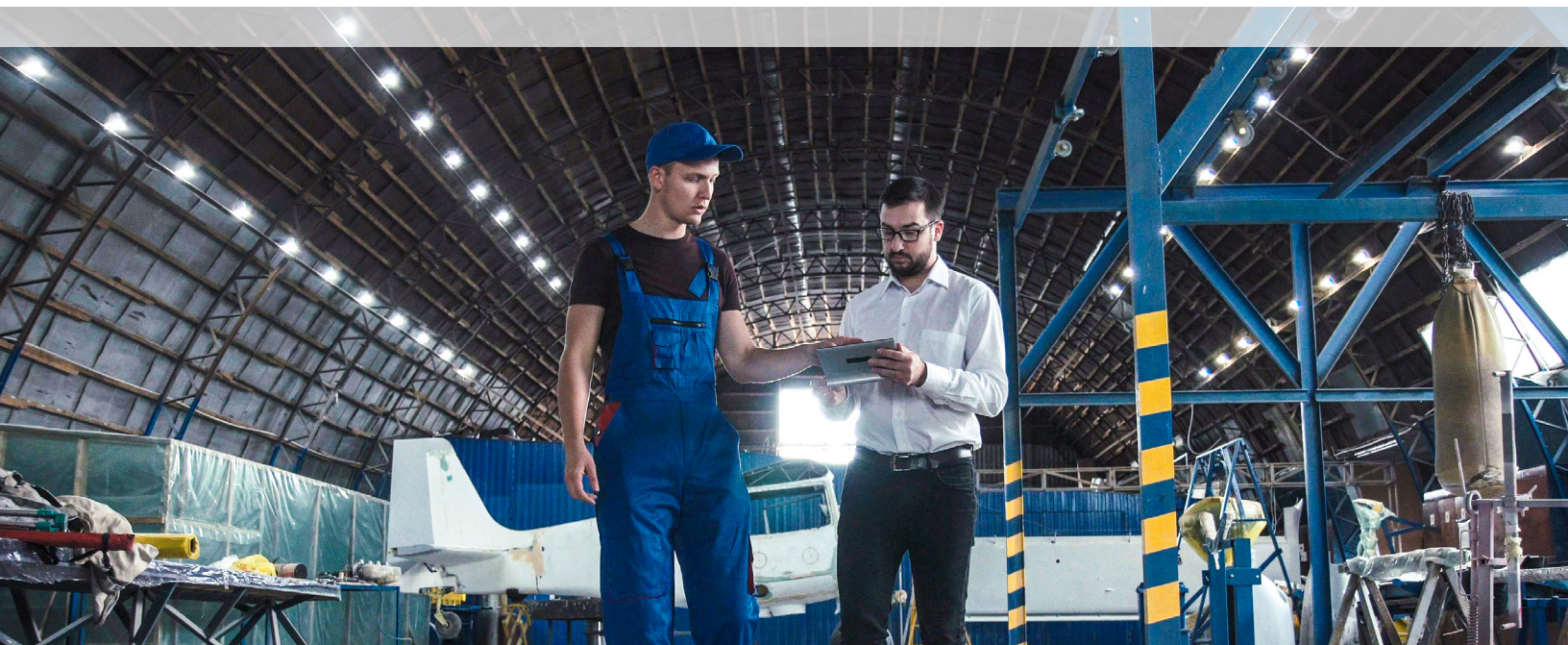
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4. **Nuclear Energy Institute (NEI)** – The Nuclear Energy Institute is the policy organization of the nuclear technologies industry, based in Washington, D.C. NEI has hundreds of members and, with their involvement, develops policy on key legislative and regulatory issues affecting the industry. EXCEL supports the following NEI Working Groups and Task Forces

- TSTF
- Advanced Reactors
- Accident Tolerant Fuel
- License Renewal
- Physical Security
- Cyber Security
- Risk-Informed Activities
- Operations Enhancements
- 24-Month Fuel Cycle Extension
- Design and Licensing Basis
- New Build Licensing
- Nuclear Policy

5. **PWR and BWR Owners Groups** – EXCEL’s involvement with the PWR and BWR Owners Groups keeps EXCEL on the forefront of regulatory opportunities and issues. Our industry involvement gives EXCEL a unique, industry-wide viewpoint that is invaluable to our utility clients. EXCEL supports the identification of generic nuclear industry issues and creates generic and plant specific resolutions for them including getting NRC approval and implementation (programs, processes, and training) for every nuclear plant in the US.

6. **World Nuclear Association (WNA)** – Assists the Board of Directors in the implementation of the vision and mission across the global nuclear industry. Served as Vice Chair of the WNA Cooperation in Reactor Design, Evaluation and Licensing (CORDEL) Group. CORDEL establishes cooperation between the industry and the regulatory communities to move toward international standardization of reactor designs and harmonization of regulatory requirements and to further the necessary deployment of nuclear power globally. He is developing a generic guide for Regulatory Authorities to determine how to review nuclear reactor technologies that have licensing or design certification in their country of origin.

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- A photograph of a nuclear power plant at dusk or dawn. Two large cooling towers are visible, with smoke or steam rising from them. The plant itself is a complex of various structures, including buildings and piping, situated in a landscape with some greenery and distant hills under a colorful sky.
7. **Civil Nuclear Trade Advisory Committee (CINTAC)** – Past Chair of several Subcommittees and the representative speaker at many governmental meetings/conferences. The Committee advises the Secretary on the development and administration of programs to expand U.S. exports of civil nuclear goods and services in accordance with applicable U.S. laws and regulations, for use by the Department in its role as a member of the Civil Nuclear Trade Working Group of the Trade Promotion Coordinating Committee and the Department's active participation in the Atoms for Prosperity interagency group.
 8. **United States Energy Association (USEA)** – Serve on the Board of Directors for the USEA. The USEA supports policy and technical discussions with the U.S. Department of Energy to expand the use of clean energy technology globally and expands energy access in developing countries with the U.S. Agency for International Development.
 9. **International Trade Advisory Committee (ITAC) 7, Energy and Energy Services** – Serves as Vice-Chair and Chair on Committee that provides input to the U.S. Government at the highest levels on international global trade policy related to energy and energy services.





NEW REACTOR Technology Portfolio

EXCEL has vast U.S. and international licensing and regulatory experience working with regulatory bodies including the U.S. Nuclear Regulatory Commission, International Atomic Energy Agency, Canadian Nuclear Safety Commission, and 26 other country regulatory bodies. EXCEL has worked with numerous large, small, advanced, mini, and micro nuclear plant designers and operators to develop and implement licensing and regulatory strategies for all phases of the nuclear plant life cycle, from design certification, initial licensing, operations, license renewal, to decommissioning.

Since August 2005, EXCEL has been extensively involved in the preparation, review, and/or defense of most new build applications for Early Site Permits (ESPs), Design Certification Applications, and Combined Operating License (COL) applications. EXCEL's Part 52 work has supported large light water reactors, small modular reactors, and advanced reactors. EXCEL works with the advanced reactor technology companies to develop integrated plans for design, construction, and deployment.

EXCEL personnel have extensive, current experience with Part 52 issues and other activities related to managing and resolving first-of-a-kind, complex issues. EXCEL leadership led to the first ever Part 52 ESP for Clinton Power Station and first ever COL for Vogtle Electric Generating Station (VEGP) Units 3 & 4. Few within the industry can provide this extensive Part 52 background, and understanding of the regulatory issues and resolutions associated with Part 50 or Part 52.

Service offerings include:

- Part 50 and Part 52 Licensing Support
- Design Certification Support (DCD development and review)
- Early Site Permitting (ESP development and review)
- Technical Licensing / Technology Selection Support
- Emergency Planning Support (including EPZ revisions)



NEW BUILD SERVICES

Country Support

EXCEL is technology neutral and has and/or is working with all large, small, mini and micro nuclear technologies. EXCEL can assure each country selects the nuclear reactor technology that best serves all their needs. EXCEL has or is providing and can provide ALL required services to successfully implement a new nuclear reactor technology including but not limited to:

- Nuclear Feasibility Studies
- Nuclear Program Strategic Plans
- Nuclear Technology Selection (all sizes)
- Site Selection and Siting Approval
- Environmental Assessment
- Total New Nuclear Regulatory Authority Establishment
- Harmonized and Standardized Regulatory Approach
- Existing Nuclear Regulatory Support for New Nuclear Reactor Technology(s)
- Total Nuclear Infrastructure Establishment
- Design Certification Document (DCD) Development and/or Review
- Combined License Application (COLA) Development and/or Review
- Energy Studies
- Transmission and Distribution Studies
- Repurposing of Coal Plant Site and other Industrial Sites Studies
- Many other studies specific to countries' needs

EXCEL is currently developing a Global Regulatory Approach to outline and guide the regulatory authorities, new and mature, in the utilization and application of regulatory review performed in other countries.



NEW BUILD SERVICES

Additional Capabilities

EXCEL has vast U.S. and international licensing and regulatory experience working with regulatory bodies including the U.S. Nuclear Regulatory Commission, International Atomic Energy Agency, and Canadian Nuclear Safety Commission, and 26 other country regulatory bodies. EXCEL has worked with numerous large, small, advanced, mini, and micro nuclear plant designers and operators to develop and implement licensing and regulatory strategies for all phases of the nuclear plant life cycle, from design certification, initial licensing, operations, license renewal, to decommissioning.

The following are just a few of EXCEL's capabilities and areas of support:

- Siting for Nuclear Power Plants
- Critical Infrastructure Protection including Physical and Cyber Security
- PWR Steam Generator Replacement
- PWR Plant Ageing Management
- PWR Long Term Operation (LTO)
- Radioactive Waste Management
- Decommissioning
- Plant Modifications
- Maintenance / InService Inspection (ISI)
- Scientific Codes
- Meteorology
- Oceanography and Coastal Engineering
- Human Induced External Events
- Source Term Analysis for Nuclear Material
- Scientific Support on Seismic Analysis
- Environmental Science



NEW NUCLEAR BUILD

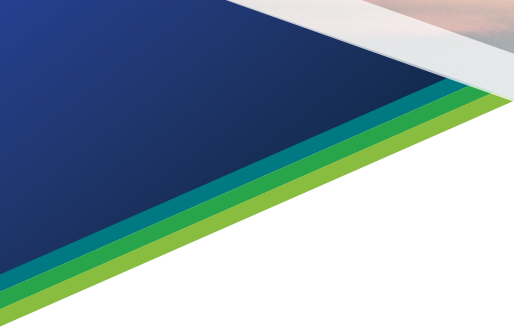
Part 50 and Part 52 Licensing Support

EXCEL has been extensively involved in the preparation, review, and/or defense of most new build applications for COLAs. EXCEL support included project leadership, development of COL application text, responses to NRC RAIs and licensing position papers. EXCEL developed regulatory strategies to resolve complex licensing issues and interfaced with the NRC staff. EXCEL interfaced with the reactor vendors to resolve plant-specific issues and modify their DCDs. As part of this interface, EXCEL developed, reviewed and commented on draft DCD-related documents, topical reports, and ITAAC closure packages.

EXCEL provided leadership or participated in the various DCWG for coordinating standardization of applications across the member utilities, support of the DCD Amendment activities (topical report development and review, RAI response development and review, licensing strategy input, DCD revision drafting and review) and consideration of those activities on the COL applications.

Key projects in this area include:

- NuStart AP1000 Reference COLA (R-COLA) and Subsequent COLAs (S-COLAs)
- NuStart ESBWR R-COLA
- UniStar COLAs (six COLAs)
- Entergy, DTE Energy, and Dominion Power COLAs (GEH ESBWR)
- NRG South Texas Project (STP) COLA
- Vogtle 3&4 COLAs
- V.C. Summer 2&3 COLAs
- Vogtle 3&4 Post COLA Support and Operations Support
- X-Energy Support
- NuScale Support



NEW NUCLEAR BUILD

Design Certification Support

EXCEL has been involved in the preparation and/or review the majority of applications for the various reactor designers applying for U.S. design certification (DC) or amending a previous DC under Part 52. We have experience working on the various DCD information types (Tier 1, Tier 2, Tier 2*, and Technical Specifications). EXCEL personnel were responsible leads for most DCD chapters and supplemental support for all other chapters, including significant roles in drafting and negotiating Tier 1 content including ITAAC.

Our expertise includes coordinating and developing revisions to DCD chapters, responses to NRC RAIs, developing position papers to address first-of-kind or evolving licensing issues, and preparing ACRS presentations. EXCEL also provided licensing leadership and participated in the various Design Centered Working Groups (DCWG), which maintain standardization of the applications across the member utilities.

Key projects in this area include:

- The AP1000 Design Certification Application Amendment;
- The GEH ESBWR Design Certification Application;
- The AREVA EPR Design Certification Application;
- MHI US-APWR Design Certification Application;
- The KHNP APR1400 Design Certification Application; and
- The Toshiba ABWR Design Certification Rule Renewal Application.



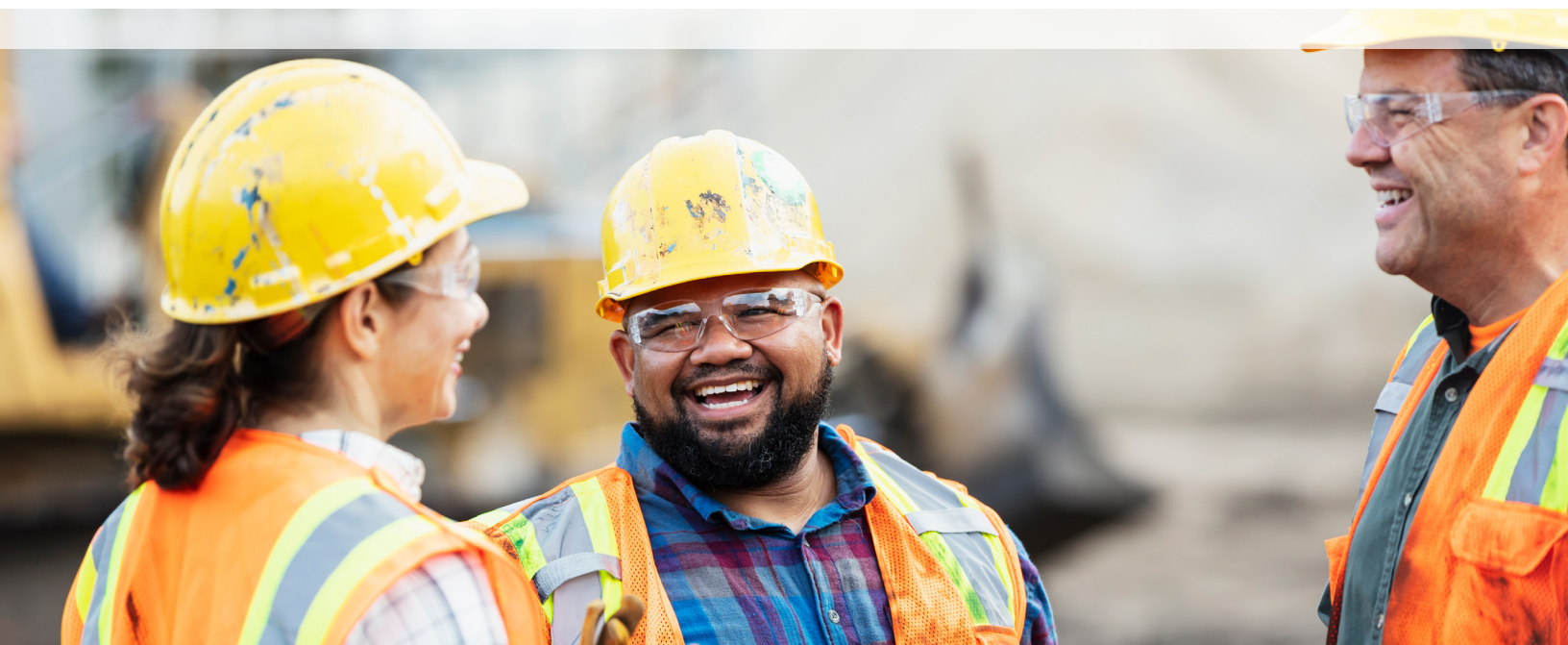
NEW NUCLEAR BUILD

Early Site Permitting

EXCEL provided overall licensing leadership for development and submittal of the first ever Part 52 Early Site Permit application including development of responses to NRC requests for additional information (RAIs). This role also included preparation and presentation to the Advisory Committee for Reactor Safeguards (ACRS) and expert testimony to the Atomic Safety and Licensing Board (ASLB), leading to the eventual issuance of the Clinton ESP, the first such ESP issued under Part 52. This ESP provides for eventual utilization of a wide range of reactor designs through a plant parameter envelope evaluation format. EXCEL is currently providing management-level support for the Clinch River ESP.

Key projects in this area include:

- Exelon Clinton Power Station
- TVA Clinch River SMR Project
- Support for Several Countries Site Evaluations





NEW NUCLEAR BUILD

Technical Support / Licensing / Technology Selection

For advanced reactor designers and potential license applicants, EXCEL can develop and implement a licensing strategy for success that applies key elements including:

- Utilizing the progress achieved from previous licensing efforts and NRC and other regulatory authorities interactions associated with a particular technology or design center
- Working collaboratively with vendors, applicants, NRC and industry on resolution of generic licensing issues
- Engaging regulatory authority early to identify and resolve technical, regulatory and policy issues
- Determining the optimum license approach (e.g., Part 50, Part 52, etc.) by evaluating the available alternative approaches to plant licensing (e.g., Part 50, Part 52 COLA or COLA/DCD combination, prototype nuclear power plant (using 10 CFR 50.43(e)) and provide a recommended approach
- Identifying pre-application activities associated with key licensing issues such as defining the project-specific activities that need to be performed in order to identify those areas where NRC or other regulatory authority light-water reactor (LWR) licensing requirements may need to be adapted or revised to address the licensing of a gas reactor technology
- Estimating the scope of expected interactions with regulatory authority staff
- Identifying possible pre-application Topical and Technical Reports applicable to the technology; and
- Developing a level 1 proposed schedule for licensing-related activities leading to a license.

EXCEL is reactor technology neutral and is very knowledgeable of global large, small, and advanced reactor technology designs. As such, EXCEL is uniquely qualified to provide Reactor Technology Assessment Reports for any country considering large, small, and/or advanced reactor builds. EXCEL has performed 11 such studies and reports over the last 10 years. These reports have been used to justify decisions for stakeholders such as Prime Ministers, Parliament, Government Ministries, Regulatory Authorities, Owners/ Operators, Investors, and Citizenry.

Key projects in this area include:

- Country Technology Selection for all Reactor Sizes
- Puerto Rico Feasibility
- UAE Technology Selection
- Multiple Current Countries Support



NEW NUCLEAR BUILD

Emergency Planning Support

EXCEL supports the development, testing, and validation of emergency preparedness and response programs that ensure client sites are prepared to react to a wide spectrum of emergencies. EXCEL has had success assisting plants by reviewing the emergency preparedness and response program and making independent recommendations on changes that can be accomplished under 10 CFR 50.54(q), with additional reviews of changes possible under 10 CFR 50.90. EXCEL has also been successful in providing on-demand licensing and regulatory assistance to clients. This assistance includes inspection support, preparing for interactions with the regulator, developing and/or reviewing licensing or change packages, and assisting and mentoring staff.

Key projects in this area include:

- EP for New Nuclear Build
- NuScale Support
- X-Energy Support
- Westinghouse AP1000 Support
- KHNP APR1400 Support





OPERATING FLEET O&M Reduction Portfolio

EXCEL is dedicated to the highest levels of licensing and engineering excellence and integrity. Our personnel deliver quality technical solutions as well as provide strategic support to help our clients achieve their business goals.

The adoption of a holistic strategy is imperative if the nuclear industry wants to achieve significant reductions in operation and maintenance costs. However, for plant modernization and innovation in performance, utilities are faced with challenges when demonstrating return on investment. The return on investment from the activities below include: reduced plant staffing, establishing higher equipment reliability, and increasing maintenance efficiency and operational flexibility – all while increasing plant safety. Utilities need to know what the most informed investment is for their organization; which technologies are most transformative and where they should plan on spending in future.

Service Offerings Include:

- Digital Instrumentation and Control (DI&C)
- Physical, Cyber, & Information Security
- 24-Month Fuel Cycle and Surveillance Interval Extension
- Single / Multiple Traveler Adoptions
- Improved Technical Specification (ITS) Conversions/Upgrades
- Power Upgrades
- 50.69 Implementation
- Risk-Informed Licensing
- License Renewal / Subsequent License Renewal
- Decommissioning Support



OPERATING FLEET ITS Conversions/Upgrades

EXCEL's professionals have experience in providing all facets of Technical Specification services. EXCEL has had extensive involvement with numerous nuclear utilities, specifically in the area of either improving or amending the Technical Specifications to support continued operation. In addition, the associates of EXCEL have a broad and diverse licensing background. EXCEL's ITS Conversion/Upgrade experience makes EXCEL uniquely qualified to support ITS projects and includes:

- EXCEL has written the ITS conversion license amendments and supported the licensing for every ITS conversion in the United States (all 76 plants). **No other firm has written an ITS conversion amendment for a U.S. plant.**
- EXCEL has performed a "turn-key" ITS conversion project (project management, development, licensing, and all implementation activities) for the last 19 plants converting to ITS. No other firm has done any ITS conversions.
- EXCEL is the technical coordinator for the industry Technical Specifications Task Force (TSTF). EXCEL coordinates all industry and NRC-initiated changes to both the PWR and BWR ISTS NUREGs and is the only firm to have involvement in the enhancement of the ITS.
- EXCEL has created and typed the last three revisions to both the PWR and BWR ISTS NUREGs for the NRC and is currently finalizing the latest revision of the ISTS NUREGs; Revision 5.
- EXCEL is the author of the industry writer's guidance document, TSTF-GG-05-01, "Writer's Guide for Plant-Specific Improved Technical Specifications."
- EXCEL is the author of the industry ITS conversion guidance document, TSTF-GG-13-01, "Improved Technical Specifications Conversion Guidance."
- EXCEL has managed and performed procedure upgrade efforts in concert with ITS conversions and as standalone projects, to include Power Up-rate, Containment Conversion, 24 Month Fuel Cycle Extension, Steam Generator Conversion, digital upgrades, and other various plant modifications. Since 1995, EXCEL's procedure writing experience encompasses projects requiring the revision or creation of over 300,000 procedures.

A photograph of a nuclear power plant with two large cooling towers and a tall smokestack, set against a sunset sky. The image is partially obscured by a white diagonal line and a blue and green geometric shape in the top left corner.

OPERATING FLEET

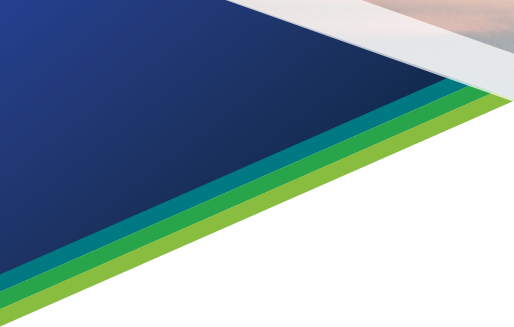
24-Month Fuel Cycle Extension Support

Currently 31 of the 32 Boiling Water Reactors (BWRs) in the US operate on a 24 Month operating cycle. EXCEL has supported 26 of those 31 transitions to the extended operating cycle, turn key or project major efforts either as a part of an Improved Technical Specification project or as a stand-alone 24 Month Cycle Extension project. EXCEL has provided selected engineering technical and licensing support to the other 5 BWRs.

Currently 11 Pressurized Water Reactors (PWRs) at 6 sites operate on a 24 Month operating cycle. DC Cook 1&2 is licensed to operate on a 24 Month operating cycle but currently does not. EXCEL has supported all of these, in that EXCEL performed a turnkey 18 to 24 Month Surveillance Extension project for D. C. Cook Units 1 and 2, and provided significant engineering support for the Oconee Nuclear Station Units 1, 2, and 3, Calvert Cliffs Units 1 and 2, Davis Besse, Robinson Nuclear Plant and Prairie Island Units 1 and 2 transitions to a 24 Month operating cycle.

EXCEL has more experience and expertise in the supporting evaluations and development of justifications for 24 Month operating cycles than any other nuclear engineering company in the world. EXCEL has more experience than any company in the particular technical subjects that are very unique to 24 Month Cycle Extension projects. Those subjects are surveillance failure analyses and instrument drift analyses. Specifically, EXCEL has performed **drift analyses and failure analyses** at every BWR and every PWR facility that has implemented 24 Month Fuel Cycle Extensions.

Although other companies may have claimed to have performed full turn-key 24 Month Cycle and Surveillance Extension Projects in the United States, none have done so, except for EXCEL. Only on a few of our 24 Month Projects has another company provided support, and their scope was generally limited to non-24-Month-specific scope – just normal uncertainty / setpoint calculation revisions, and data gathering. And on these projects, we only partnered with the other company because the client utility was using the other company for other support and it was easier for the clients to contract EXCEL through the other company. Otherwise, all of other projects has been direct contract to EXCEL.



OPERATING FLEET

Power Uprate Support

EXCEL has significant experience and expertise in the analysis and licensing for Measurement Uncertainty Recapture (MUR) power uprates, which utilize a reduction in feedwater measurement uncertainty through the use of ultrasonic flowmeters. EXCEL has provided the calculation and licensing support for various plants, supporting power uprate projects for both PWRs and BWRs. EXCEL also has significant experience in strategic licensing for Extended Power Uprate (EPU) projects. EXCEL has supported the technical and licensing of over 30 MUR power uprates and EPUs.





OPERATING FLEET

License Renewal / Subsequent License Renewal Support

EXCEL has significant experience supporting License Renewal (LR) and Subsequent License Renewal (SLR) projects in the areas of project management, engineering, and licensing. EXCEL has provided licensing leadership and strategies for 39 license renewal projects. EXCEL's experience in license renewal includes assisting licensees with the following: (1) mechanical scoping and screening; (2) the Aging Management Report (AMR) production; (3) the Aging Management Program (AMP); (4) Time-Limited Aging Analysis (TLAA) development; (5) environmental support, (6) license amendment request submittal development and defense including audit and request for additional information (RAI) support, and (7) overall program implementation.

EXCEL staff developed many of the industry standard documents on the subject of license renewal. EXCEL staff were the Principal Author of EPRI Report No. 1013475, "License Renewal Electrical Handbook" and EPRI Long Term Operations: Subsequent License Renewal Electrical Handbook (EPRI Report No. 3002010401). EXCEL staff were participants in the License Renewal Electrical Working Group (LREWG) that approved this report, and developed the EPRI Report No. 1003458, "License Renewal Electrical Template."

EXCEL staff contributed to the NEI White Paper in Response to the Non-EQ Cable Connection Program provided in NUREG-1801, Rev 1, and developed the Non-EQ Cable Connection Program that was the template for LR-ISG-2007-2. LR ISG 2007 2 was the input for the program described in NUREG-1801, Revision 2. EXCEL staff developed the Non-EQ Metal Enclosed Bus Program that was presented as an NEI White Paper in response to LR-ISG-17. This program was the input for the program described in NUREG-1801, Revision 1.

EXCEL staff are currently supporting 3 SLR projects.





OPERATING FLEET

Physical / Cyber Security Support

EXCEL's Critical Infrastructure Protection Services team is organized to support clients and reduce operating and maintenance costs in the physical, cyber, and information security areas. EXCEL provides immediate access to a dynamic team of subject matter experts with extensive nuclear industry and regulatory experience.

Physical Security

The cost of maintaining a physical security program at a licensed nuclear power plant has grown over the years. With increasing requirements, more aggressive performance testing by NRC, and post-9/11 actions, the security budget has grown enough to get the attention of decision makers at the corporate level. EXCEL has had tremendous success in recent years assisting plants by reviewing the security protective strategy and making independent recommendations on changes that can be accomplished under 10 CFR 50.54(p), with additional reviews of changes possible under 10 CFR 50.90. EXCEL has also been successful in providing on-demand licensing and regulatory assistance to clients. This assistance includes inspection support, preparing for interactions with the regulator, developing and/or reviewing licensing or change packages, and assisting and mentoring staff.

Cyber Security

EXCEL's team has assisted clients and the nuclear industry in preparing for NRC cyber security full implementation inspections, establishing appropriate safeguards to protect the digital assets and systems from unauthorized use, writing guidance documents, and recommending innovative solutions for addressing potential areas of weakness. During readiness assessments for the NRC full implementation inspection, EXCEL conducts a review of the client's Cyber Security Plan (CSP) and program implementing procedures and activities being conducted to be in full compliance with the CSP. This includes walkdowns of critical digit assets (CDAs); CDA assessment reviews; and review of portable media and mobile device (PMMD) controls, and Kiosk controls and processes.

Key projects in this area include:

- NEI Support
 - White papers / guidance documents
- Cyber Inspection prep
- Cyber Inspection support during NRC inspection
- Physical Security independent assessment
- Physical and Cyber Security Post inspection support



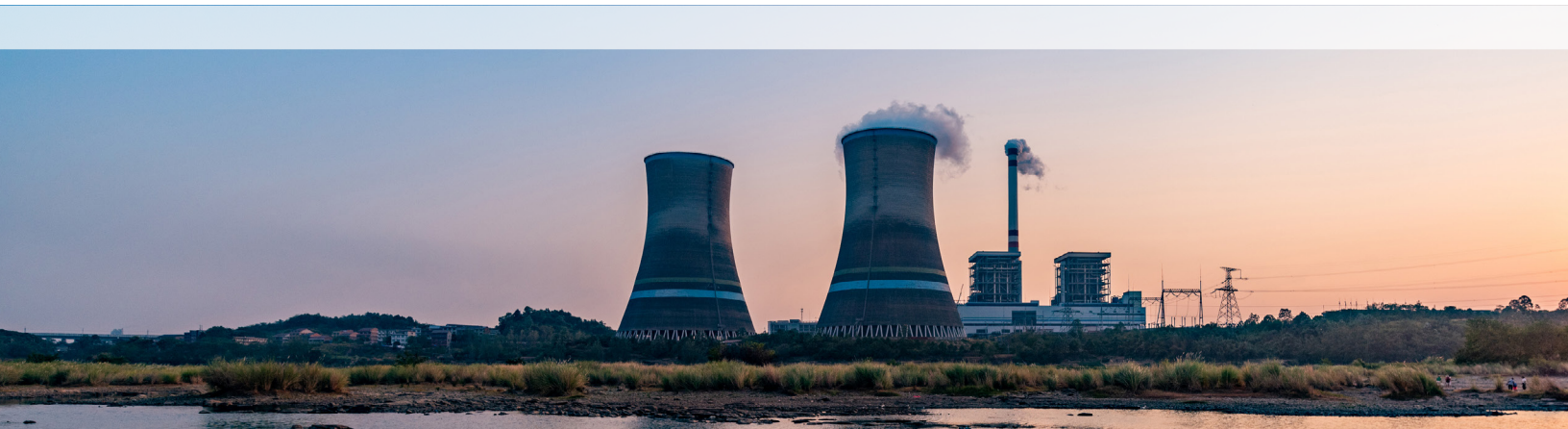
OPERATING FLEET Event Response Portfolio

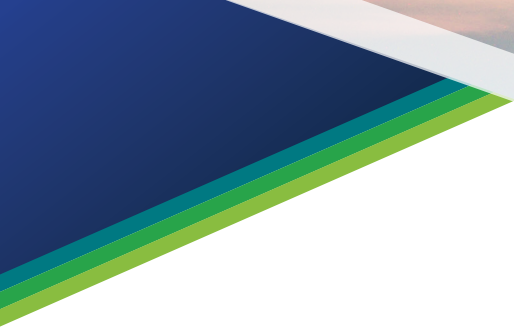
EXCEL is harnessing its world-class technical and regulatory expertise to create competitive advantages for our clients by helping them to confront their most difficult challenges and turn them into opportunities. The EXCEL team of leading experts, with extensive industry experience, offers an unparalleled level and breadth of skill and service to help our clients address whatever challenges may lie ahead, including cultural assessments and regulatory support.

EXCEL helps nuclear operators to prepare for and follow up on Reactor Oversight Process (ROP) periodic and reactive (9500X Series) inspection activities by providing mock inspections and other services. EXCEL provides support for event assessment and recovery, and provides assistance in improving performance problems that have moved client performance out of Column 1 of the ROP Action Matrix. EXCEL ensures a robust and professional response to traditional enforcements by providing guidance, preparation, and coaching for enforcement conferences, Alternative Dispute Resolution sessions, and Safety Culture issues. EXCEL brings personalized coaching for pre-Commission Meetings, Drop-in preparations for meetings with Senior NRC leaders in Headquarters and the Regions, and the development of Regulatory Communication Plans.

Service Offerings Include:

- Cultural Assessments
- Inspection Assistance and Response
- Event Assessment and Recovery
- Corrective Action Assistance and Response





OPERATING FLEET

Event Response

EXCEL is harnessing its world-class technical and regulatory expertise to create competitive advantages for our clients by helping them to confront their most difficult challenges and turn them into opportunities. The EXCEL team of leading experts, with extensive industry experience, offers an unparalleled level and breadth of skill and service to help our clients address whatever challenges may lie ahead. These services include event assessment and recovery, and provides support for identifying the root cause of the event, developing corrective action plans, preparing and holding interactions with the regulator, and implementing the effectiveness of corrective actions.

EXCEL routinely provides this service utilizing former NRC inspectors and senior executives to advise and provide assistance to senior client management in strengthening regulator confidence in the client's safety and security performance (often referred to as "regulatory standing") and in improving the client's relationship with the Inspectors. EXCEL has a broad bench of talent with extensive experience in many areas, which allows clients to select experts with varied skill sets to address the precise problem that exists.





OPERATING FLEET

Workforce Enhancement Portfolio

EXCEL is recognized as the premier supplier of licensing, regulatory compliance, and Technical Specifications (TS) services, and has extensive experience in successful negotiation regarding regulatory, operations, engineering, licensing and TS issues. EXCEL's corporate offices are strategically located near the Nuclear Regulatory Commission to facilitate the most effective and efficient support of Nuclear Regulatory Commission review and approval efforts of any licensing or regulatory issues.

EXCEL's professionals have experience in providing all facets of TS and Licensing services, including training and knowledge retention programs. EXCEL has had extensive involvement with numerous nuclear utilities specifically in either improving or amending the TSs to support continued operation. EXCEL has detailed knowledge of Pressurized Water Reactor (PWR) and Boiling Water Reactor (BWR), Standard TS, Custom TS, Improved Standard Technical Specification (ISTS), regulations, design and licensing bases, and safety analyses. EXCEL believes that this combination of experience and knowledge ensures the development of the best quality product in a cost-effective manner and in accordance with the highest standards of professional excellence.

Service Offerings Include:

- Licensing Support
- Training
- Design Basis Retrievability
- Knowledge Retention Programs



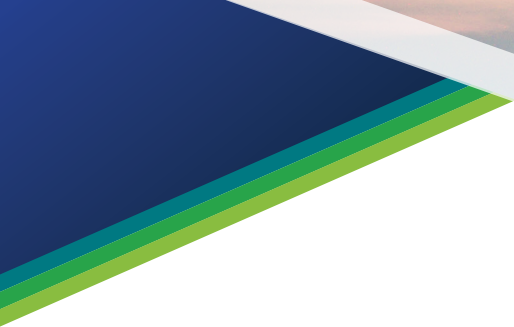


OPERATING FLEET Training

As the commercial nuclear industry's recognized licensing, compliance, and regulatory experts, EXCEL provides training to U.S. and international clients on topics such as Technical Specifications usage (licensed operators and regulatory staff), performing regulatory research, writing effective license amendment requests, creating an effective regulatory affairs organization, implementing an effective Surveillance Frequency Control Program, 10 CFR Part 52 (new reactors) regulations, risk informed initiatives PRA applications, engineering, and digital instrumentation and controls licensing.

EXCEL conducts training for regulatory staff that are expected to prepare license amendment submittals that utilize risk-informed information and must meet Nuclear Regulatory Commission guidance, including Regulatory Guide 1.174 and 1.177. The training gives regulatory staff the knowledge to incorporate input from other utility organizations, such as the Probabilistic Risk Assessment staff, to ensure the submittal meets all regulatory expectations and will be accepted by the Nuclear Regulatory Commission for review. The training also provides participants with a working knowledge of PRA technology, terminology, and methods sufficient to understand regulatory guidance and successfully interface with the utility PRA staff to prepare license amendments and evaluate Nuclear Regulatory Commission inspection findings.





OPERATING FLEET

Innovative Solutions Portfolio

EXCEL is synonymous with innovative regulatory approaches. Our technical support of the Pressurized Water Reactor Owners Group (PWROG), the Boiling Water Reactors Owners' Group (BWROG), and the AP1000® Owners Group (APOG), and our management of the Technical Specifications Task Force, keeps EXCEL on the forefront of regulatory opportunities and issues. Our industry involvement gives EXCEL a unique, industry-wide viewpoint that is invaluable to our utility clients. When operating plants are faced with difficult regulatory questions, they turn to EXCEL.

EXCEL's associates have decades of experience and are recognized as the experts in their field. Utilities call on EXCEL to create or manage complex regulatory products, take advantage of risk-informed opportunities, solve difficult regulatory problems, and train their regulatory staffs. EXCEL has signification experience in all phases of project management lifecycle, including scoping studies, researching and designing, licensing, procedure development, implementation, and trending. EXCEL has been on the ground floor with most NRC and industry initiatives, and is ready to support clients with innovative solutions and strategic assistance to implement all future technology, licensing, and process changes, helping our clients achieve their business goals.

Service Offerings Include:

- Cost Savings Through Owner's Group Activities
- Modernization of Regulatory Processes
- Accident Tolerant Fuel (ATF)
- Security by Design
- Engineering Solutions
- Reliability Enhancements
- Regulatory Decommissioning Financial and Project Approaches

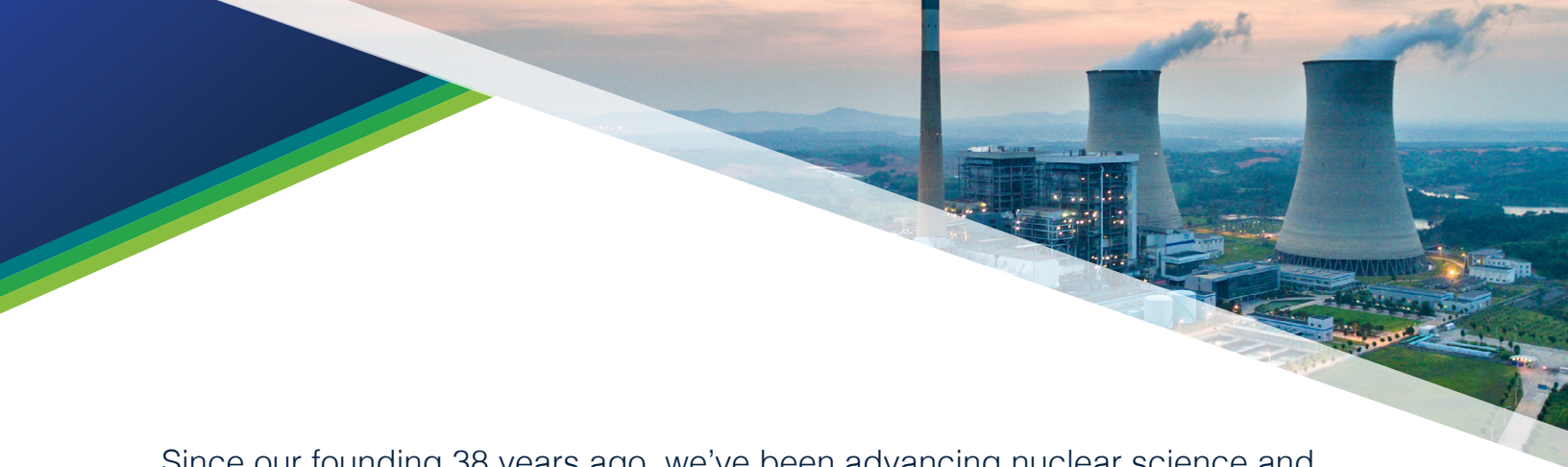


OPERATING FLEET

Owners Group Support

EXCEL has provided regulatory and technical support to the PWROG, BWROG, APOG, and their predecessor organizations, for almost 30 years. Through the Owners Groups, EXCEL provides “any time, on request” regulatory and technical support to every commercial reactor in the United States and abroad. EXCEL also manages the joint Owners Group Technical Specifications Task Force (TSTF), that is the focal point for industry interaction with the Nuclear Regulatory Commission on generic technical, regulatory, and compliance issues related to the Technical Specifications. EXCEL has created all of the 500+ TSTF travelers (generic changes to the Technical Specifications), including all risk-informed travelers.



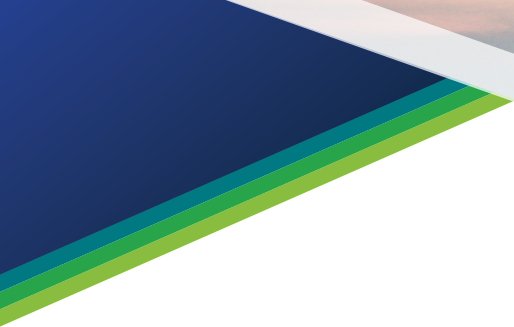


Since our founding 38 years ago, we've been advancing nuclear science and technology to make the world a safer place. We are a global team of engineers, scientists and consultants — dedicated to protecting human health and the environment through the application of best practices in safety and security. We are the leaders in developing policy, conducting research, and providing cost-effective engineering alternatives. And we earned that status through thousands of projects where our expertise proved instrumental in ensuring the protection of people, the facilities they worked in, and the surrounding environment.

SAFETY **Is The Only Outcome**

Where nuclear safety is concerned, there is no room for error. With continued global initiatives moving to clean, reliable and affordable energy, the nuclear industry is focused on new designs and upgrades that increase reliability and maintain safety while eliminating unnecessary costs. Facility owners/operators rely on us to provide risk analysis expertise that will improve production without compromising protection. In order to do this and understand the latest developments in the field, we stay actively involved with industry policy and research. This allows us to offer a range of solutions using risk-informed decision-making, experienced-based engineering and innovative software solutions. We have provided these services for more than 100 nuclear facilities, including the entire U.S. nuclear fleet as well as in Canada, Asia, Europe, South America, Africa, and the Middle East.





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