

October 7, 2019

Marian L. Zobler
General Counsel and Designated Agency Ethics Official
United States Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2738

Dear Ms. Zobler:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Inspector General of the Nuclear Regulatory Commission (NRC).

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

My spouse is employed by the Embassy of the Netherlands in a position for which she receives a fixed annual salary. For as long as my spouse continues to work for the Embassy of the Netherlands, I will not participate personally and substantially in any particular matter involving specific parties in which I know the Kingdom of the Netherlands is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I will retain my position as co-trustee of my family's revocable living trust. I will not receive any fees for the services that I provide as a trustee during my appointment to the position of Inspector General. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the trust, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

I understand that the NRC has a supplemental ethics regulation, 5 C.F.R. § 5801.102, that prohibits me and any spouse or minor child of mine from owning any stock, bonds, or other security interests issued by companies on an annually published list of prohibited securities. This list includes certain business organizations and governmental bodies, as well as energy or utility sector-investment funds with more than 25% of their assets invested in prohibited securities. I understand that the NRC's prohibited securities rule prevents me from owning these securities in any amount during my appointment, including amounts that would otherwise qualify for exemption under 5 C.F.R. § 2640.201(b) and 2640.202.

Consistent with the NRC's prohibited securities rule, if I am confirmed as Inspector General, within 90 days of my confirmation I will divest my holdings in the following entities: Dominion Energy, DTE Energy, Duke Energy, Entergy Arkansas, Entergy Louisiana, Entergy Mississippi, General Electric, Honeywell, NextEra Energy, SCE Trust, and Southern Company. These entities are not reported on my public financial disclosure report because they are below the reporting thresholds. With regard to each of these entities, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the entity until I have divested it, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

Within 90 days of my confirmation, I will also divest my interests in the following entities: Akamai Technologies Inc., ClearBridge MLP and Midstream Fund, Comcast Corp., Microsoft Corp., Verizon Communications Inc., and Energy Select SPDR. With regard to each of these entities, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the entity until I have divested it, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

If I rely on a *de minimis* exemption under 5 C.F.R. § 2640.201(b) with regard to any of my financial interests in sector mutual funds, I will monitor the value of those interests. If the aggregate value of my interests in sector mutual funds that concentrate in any one sector exceeds \$50,000, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of any holdings of the funds that are in the specific sector in which the funds concentrate, unless I first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

I understand that I may be eligible to request a Certificate of Divestiture for qualifying assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether I receive a Certificate of Divestiture, I will ensure that all divestitures discussed in this agreement occur within the agreed upon timeframes and that all proceeds are invested in non-conflicting assets.

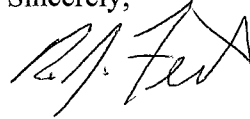
If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), or obligations of the United States.

I will meet in person with you during the first week of my service in the position of Inspector General in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13770) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file financial disclosure reports.

Sincerely,

A handwritten signature in black ink, appearing to read "R. J. Feitel", written in a cursive style.

Robert J. Feitel