

**From:** [Ramsey, Kevin](#)  
**To:** [Wheeler, Jennifer K.](#); [Weir, Kris D.](#)  
**Cc:** [Smith, Galen](#); [Chitty, Mark](#); [Crespo, Manuel](#)  
**Subject:** Request for Information on Programs for Work Hour Limits  
**Date:** Thursday, September 13, 2012 3:46:00 PM

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As a follow-up to the previous request for information on security officer's work hours at selected fuel cycle facilities, the U.S. Nuclear Regulatory Commission is collecting further information. The information being requested at this time includes questions and supporting documentation on programs currently in place for work hour limits for individuals that fill a non-administrative security position. The submittal of this information is strictly voluntary.

Although some fuel facilities are being requested to submit information on drug and alcohol testing programs, we recognize that Category I fuel facilities like NFS are already subject to the drug and alcohol testing requirements in 10 CFR Part 26.

#### Background:

The NRC staff is in the process of developing a regulatory basis for pursuing a rulemaking to revise 10 CFR Parts 26 and 73. The proposed rulemaking would make specified security personnel at fuel cycle facilities subject to the fitness for duty (FFD) requirements listed in 10 CFR Part 26, including fatigue management through work hour limitations. The purpose of the regulatory basis is to justify moving forward with the proposed rulemaking.

As part of the development of the regulatory basis and to determine if security officers at fuel cycle facilities should fall under the FDD requirements of 10 CFR Part 26, the staff previously collected information from selected fuel cycle licensees to determine if security officers at fuel cycle facilities were working excess levels of overtime that may attribute to fatigue-related issues and may impair their performance. The security officer work hour information was voluntarily supplied by several fuel cycle licensees. In order to complete staff's analysis for the regulatory basis and to determine whether to pursue having security officers at fuel cycle facilities be subject to the FFD requirements, the staff is requesting that selected fuel cycle licensees answer the questions below and provide supporting documentation (e.g., policies or procedures) on any programs in place for work hour controls for individuals that fill a non-administrative security position. This information will allow the staff to make a more informed decision on whether the NRC should proceed with the rulemaking to implement 10 CFR Part 26 FFD requirements for security officers at fuel cycle facilities.

Please respond to the following questions:

1. Is there a program or policy currently in place at your facility to limit the number of work hours during a specified period for security personnel that fill a non-administrative security position?
2. If yes, please provide a copy of your facility's program or other documentation regarding the program (e.g., procedures). Note: This procedure or policy document will be considered proprietary and will not be docketed or put into ADAMS.
3. If yes, does this program pertain to personnel/employees other than security officers, and if so who?

Please provide the name and telephone number of a person at your facility who can be contacted for questions or further information on this topic.

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