

## Detailed Comments From the January 23, 2003, Public Meeting

### Industry View

- ! Staff review of security personnel work hours (collected late August to late October 2002) does not reflect current conditions in the industry.
- ! Security personnel fatigue is not as important or urgent as other issues in the security area.
- ! NRC staff relies too heavily on the use of Orders. Security personnel fatigue should be pursued via rulemaking.
- ! If the staff feels an Order is required, the industry would support extending Generic Letter 82-12 to cover security personnel.
- ! Narrow the scope of the compensatory measures (CMs) to address issues of urgency. Eliminate references to "Self-Declaration Procedures" and "Fatigue Mitigation Controls."
- ! Industry wants to link the timing of the review and comment periods for the proposed orders on fatigue and guard force training due to their compounding effect.
- ! Industry does not want voluntary overtime regulated.
- ! Industry is concerned over the impact of this Order on existing collective bargaining agreements.
- ! Industry requested a second meeting prior to the staff moving forward.
- ! Revise the 24/48 work hour limit to 26/48 work hour limit to better accommodate the 12-hour shift schedule.

### Nuclear Security Officers

- ! The NRC should protect the rights of individuals to earn as much voluntary overtime as they want.

### Public View

- ! Order should apply to all workers important to safety, not just security force personnel.
- ! The proposed Order/CMs have loopholes that may allow excessive overtime to continue.
- ! Industry should not be allowed to extend overtime beyond the work hour limits of 16/24, 24/48, and 72/7 day.
- ! Industry should not be allowed to use the elevated overtime limits for planned events such as outages.