

April 14, 2004

Mr. Winfred D. Nash
Vice President and General Manager
BWXT - Nuclear Products Division
P.O. Box 785
Lynchburg, VA 24505-0785

Dear Mr. Nash:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your letter to Chairman Diaz of March 3, 2004, regarding the draft security Order on worker fatigue at Category I Fuel Cycle Facilities. In your letter you stated that the fatigue Order is not required and imposes an unnecessary burden on your facility in terms of adding an additional layer of complexity and cost, as well as unwarranted intrusion into your management of security operations. You stated that BWXT has implemented corrective actions to combat fatigue by hiring additional security officers, and asserted that these actions have resulted in approximately a 50 percent increase in security staffing and a reduction in overtime to approximately 20 percent. Additionally, you noted that most officers work in two-person teams while officers assigned to single-person stationary posts are frequently rotated through a variety of posts or given frequent breaks. NRC commends BWXT's efforts in controlling overtime and managing fatigue of its security force personnel.

Throughout development of the Additional Security Measures (ASMs), NRC has worked with stakeholders by eliciting feedback on the draft ASMs during two public meetings. BWXT's efforts to address security personnel fatigue, including those identified above, were brought to the attention of the NRC staff during these meetings and are being duly considered in the development of recommendations by the staff on the ASMs. The staff's recommendations, which are expected shortly, will address the issues you have raised and will be provided for the Commission's review.

Thank you for your participation in the stakeholder meetings and your input concerning this important matter. If you have further questions or comments, please contact Glenn Tracy of the NRC at 301-415-6828.

Sincerely,

/RA/

Roy P. Zimmerman

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/RA/

Roy P. Zimmerman

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