



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

COMMISSIONER

November 12, 2002

Lt. Todd W. Lynch, Security Supervisor
Wackenhut Security Corporation
Monticello Nuclear Generating Facility
2807 West County Road 75
Monticello, MN 55362

Dear Lt. Lynch,

Thank you for your letter of October 27, 2002. I believe that you may have misinterpreted my remarks to the New York Times.

I do not oppose the use of 12-hour shifts for security forces. Indeed, the use of 12-hour shifts in a three days on/two days off, two days on/three days off cycle (which results in an average 42 hour work week) is common among security forces. However, I strongly oppose persistent use of excessive overtime. Clearly, performance will be degraded by a six days/week, 12 hours/day work schedule, alternating between day and night shifts, that persists over a long period of time. There may be a need for such overtime in an emergency, such as after September 11, 2001. But that should be the exception, not the rule.

The Commission gave clear direction in its February 25, 2002 Order about the minimum size of security forces at nuclear power plants and other interim security requirements. I am not aware of any NRC-ordered changes since February 25, other than the NRC advisory covering the two weeks (September 10-24, 2002) when the Attorney General placed the nation at the orange threat level. Even allowing time for recruiting, hiring and training new security personnel, almost ten months after that Order licensees should not be relying on 72 hour plus work weeks to meet NRC requirements, and the vast majority are not.

I appreciate having the views of you and your colleagues, and will pass them on to my fellow Commissioners and the NRC staff. To reiterate, I do not oppose the use of 12-hour shifts for security personnel. I do oppose the persistent use of excessive overtime, except in an emergency.

Sincerely,

A handwritten signature in black ink, reading "Edward McGaffigan, Jr." in a cursive style.

Edward McGaffigan, Jr.

cc: Chairman Meserve
Commissioner Dicus
Commissioner Diaz
Commissioner Merrifield
William Travers, EDO

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