



**RIC 2010
Part 26 Subpart I**

Hironori (Pete) Peterson, Branch Chief
USNRC Region 3
Lisle, Illinois

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**Part 26 Subpart I –
Operations, Maintenance, Health Physics,
Chemistry, Fire Brigade Leader**

- For work groups other than Security the work hour rules of Part 26 are new
- Requirements are similar to the guidance of 1982 Generic Letter 82-12
- The new rule is being implemented with only a few errors

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Part 26 Subpart I - CURRENT STATUS

- NEI 06-11 rev. 1
- Guide DG-5.73
- NRC Inspection Procedures completed
- Inspection TI 2515-180 in Progress
- Inspection Findings Review Panel

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Part 26 Subpart I - Inspection Findings

- 12 Violations Reviewed
- 9 Judged Minor
- 2 Green Inspector Identified Non-cited Violations
- 1 Green Licensee Identified Non-cited Violation

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Part 26 Subpart I - 9 Violations Judged Minor

Four cases of working more than 72 hours in 7 days (No Waiver)

- Exceeded limit by 30 minutes due to end of shift hold over.
- Exceeded by limit by 1.5 hours due to early call in.
- Exceeded by limit by 2 hours due to an emergent plant issue hold over.
- Exceeded limit by 4 hours due to not accounting for travel time between sites.

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Part 26 Subpart I - 9 Violations Judged Minor

Four cases of working 9 days without a 34 hour break (No Waiver)

- Worked 9 days without a day off due to not counting off site training. (This happened at 2 sites)
- Worked 9 days with only a 24 hour break rather than a 34 hour break due to poor planning.
- Worked 9 days without a day off due to being called out on scheduled day off.

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Part 26 Subpart I - Three Green NCVs

- An operator on outage hours assigned to operating unit. The operator voiced objection but was over ruled by management.
- An error classifying work non-safety led to a number of workers exceeding limits.
- A transmission system work group working on site exceeded limits due to lack of training.

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Part 26 Subpart I – Early Lesson Learned

- If you schedule personnel at the work hour limits, 6 – 12 hour days a week, or 9 days without a break you are likely to have violations.

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