



Part 26 Subpart I

James Trapp, Branch Chief
USNRC Region 1
King Of Prussia Pennsylvania

1



Part 26 Subpart I

Security officers were already under work hour restrictions prior to implementation of this regulation. Security Managers seemed to understand the potential impact and took actions to prepare.

Actions taken:

- Additional Security Staff were hired and trained prior to implementation. This reduced reliance on overtime to cover shift staffing needs.
- Security Officers schedules were modified to meet the requirements if current schedules would not work.
- Computerized work hours tracking tools were developed to track work hours and some were designed to alert supervisors of employees approaching work hour thresholds as they input data.

2



Part 26 Subpart I

The transition to the rule in the security area has gone relatively smoothly.

- There has been some input by officers about the rule change from both perspectives. Some in favor of the change to reduce hours and some opposed because it restricted the amount of hours they could work.
- NRR has established a panel to review any findings related to the fatigue rule. However, no findings have been identified related to security.
- There are currently some infractions of this regulation in the enforcement process with willful aspects. It is important to note that willful violations of this regulation will be pursued like any others.

3
