

POGO's Recommendations to Improve the Proposed NRC Fatigue Rule

- POGO has real problems with the current fatigue order for security officers – particularly group hours and self declaration
- POGO used Beaver Valley as a case study
 - High percentage of guards worked between 60-72 hours, some well over 72 hours
 - 1st Energy initially admitted they were in violation of group hours, then claimed they were not in violation
 - NRC found them in violation on individual hours but not group hours
 - Who's in the group? NRC won't tell us. Are they all armed responders, according to the security plan? Guards at Beaver Valley couldn't believe there were enough armed responders under well under 48 hours to average out the ones working 72 hours
 - Under scrutiny from POGO and NRC, 1st Energy has resolved most of these problems by hiring more security officers and changing their attitude toward the security officers
 - Steve Whitely from Beaver Valley can elaborate on these changes

- When individuals are fatigued, their ability to respond is degraded
- As one guard pointed out, “If I’m working 72 hours and am fatigued, someone working 30 hours can’t sleep for me.”
- POGO believes that the group hours are irresponsible and should be deleted from the rule
- POGO has interviewed security officers who worked between 60-72 hours. They were in no condition to respond to the withering fire from RPGs, .50 caliber sniper rifles, platter charges, Bangalore torpedoes, that the intelligence community believes they would face during a terrorist attack.

- NRC claims the security officers unions push for overtime to increase the income of these underpaid guards.
- There is an overriding national interest. If the guards want to work 60-72 hours per week, they can get another job.

- POGO believes the NRC should closely oversee the self-declaration process.
- We have found examples of self declaring guards being fired, sent to psychiatrists and given undesirable schedules
- Ergo they are simply afraid to self-declare
- If indeed there is evidence of retaliation for self-declaration, the NRC should take enforcement action and levee significant fines

- POGO believes the draft rule on fatigue should be changed:
- No group hours
- Limit of 48 hours
- Only under the following conditions can hours increase to 60 hours/per week and individual:
 - Refueling
 - Heightened security alerts