

6.19

Facility Staff Overtime Work Limits

6.19.1

Administrative procedures shall be developed and implemented to limit the working hours of the senior reactor operators, reactor operators, health physics and chemistry technicians, and non-licensed operators; and key maintenance, construction, and Research and Testing Division personnel who perform safety-related functions.

6.19.2

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the plant is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used or during extended periods of shutdown on either unit, the following overtime limits shall be followed for the personnel identified in 6.19.1:

- a. An individual shall not be permitted to work more than 16 hours straight, excluding shift turnover time.
- b. An individual shall not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any seven-day period, all excluding shift turnover time.
- c. A break of at least eight hours including shift turnover time shall be provided between work periods. (A meal break does not separate different work periods.)
- d. Except during shutdown periods of at least three days in duration, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

6.19.3

Deviations from the overtime limits of a 6.19.2 shall be authorized by the individual's employing officer, his designated alternate, a senior staff member, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. The employing officer or his designee shall review, at an average of once a month, the number of deviations to assure that excessive deviations are not being authorized.

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As reported in IE Circular No. 80-02, dated February 1, 1980, studies indicate that with fatigue, especially because of loss of sleep, an individual's detection of visual signals deteriorates markedly, the time it takes for a person to make a decision increases, and more errors are made. Other studies show that fatigue results in personnel ignoring some signals because they develop their own subjective standards as to what is important, and as they become more fatigued, they ignore more signals. The objective of the overtime limits specified in this section is to assure that, to the extent practicable, personnel are not assigned to perform safety-related functions while in a fatigued condition. The controls will limit both continuous working hours, and accumulated working hours during any seven-day period. Additionally, the controls will ensure adequate rest breaks between work periods. The overtime limits are based on the NRC's overtime policy enumerated in Generic Letter No. 83-02, dated January 10, 1983.