

To: Select Committee on Pension Policy-SB 6378

Date: September 1, 2012

Select Committee on Pension Policy members, we request that you consider PSERS eligibility for the Nuclear Security Officer's (NSO's) of Energy Northwest's Columbia Generating Station commercial nuclear power plant located on the Hanford Nuclear Reservation near Richland, WA. We currently have NSO's enrolled as members of PERS 2 and PERS 3.

We must successfully complete a training program approved by the criminal justice training commission as provided in RCW 43.52.520. Our officers are authorized under RCW 43.52.530 to "use reasonable force to detain, search, or remove persons who enter or remain without permission within the nuclear power plant site exclusion area, or whenever, upon probable cause, it appears to a member of the security force that a person had committed, or is attempting to commit a crime."

The Code of Federal Regulations, 10 CFR 73.55 provides our mandate to maintain "properly trained, qualified and equipped personnel required to interdict and neutralize threats" ... "of radiological sabotage." Further 10.CFR.73.55 requires our training prepare us to "prevent or impede attempted acts of radiological sabotage by using force sufficient to counter the force directed at the person, including the use of deadly force..."

NSO's are required to meet stringent standards, with initial training approximately 3 months in duration before individual duty assignment. All NSO's must maintain approximately 30 annual qualifications to continue employment in their capacity. Examples of some of the required qualifications are: Full medical physical (with Nuclear Regulatory Commission (NRC) required standards)

Tactical Weapons Qualification Course (stress induced timed course 100% score

Required to pass)

Day/Night Fire Weapons Qualification Course (timed and scored test)

Radiological testing

Force on Force Drills

Quarterly Job Duty evaluation and testing

Annual Written Exam

We can provide a full list of required qualifications if the Select Committee requests.

The NRC has designated NSO's as one of two critical groups in 10CFR73.55. This requires a full psychological screening upon initial employment and every 3 years thereafter. The psychological screening consists of a Minnesota Multiphasic Personality Inventory (MMPI) test and a clinical interview with a licensed psychologist.

NSO's required equipment to carry and have available at all times are: Handgun, Rifle, Ammunition for both weapons, Radio, Handcuffs, Defense Spray, Flashlight, and Gas Mask. The approximate weight of this equipment is 25 pounds.

The physical demands of our job have proven to be difficult to maintain. In the last 5 years we have had at least 10 NSO's ranging in age from early 50's to early 60's with either medical issues that prevented them from meeting our stringent requirements or were injured during our Tactical Weapons Qualification course, resulting in loss of employment. We have also experienced two on the job fatalities, heart attack and aneurysm.

Our NSO's work 12 hour rotating shifts (6 am-6 pm, 6 pm-6 am), alternating 4 days, 3 nights, 3 days, 4 nights over a period of 21 days that repeats every 28 days. Negative effects of shiftwork on the body and long term health are well documented.

These standards require a level of physical fitness and psychological adeptness that becomes much more challenging for our members as we age. Members in their 60's must meet the same standards as younger employees in their 20's.

We currently have officers who have more than 30 years of service in the security force with service credit in PERS 2 that are only in their 50's. The requirements of this job make the prospect of continuing to meet and maintain these standards until full retirement age in PERS 2 a difficult task.

We hope you will consider our Nuclear Security Officers deserving of inclusion in PSERS.

Respectfully,

Dave Griffith

and

Energy Northwest Nuclear Security Officers