



**DEPARTMENT OF BUSINESS AND INDUSTRY
DIVISION OF INDUSTRIAL RELATIONS
MECHANICAL COMPLIANCE SECTION**

Bulletin MCS 2601

January 20, 2026

**Clarification of Regulatory Requirements for Use of Elevators
During Construction Activities**

Purpose

This Bulletin provides general guidance regarding the regulatory requirements that apply when elevators are used during construction activities. It is intended to provide clarification and to ensure consistent compliance with Nevada Revised Statutes (NRS) and Nevada Administrative Code (NAC) provisions governing elevator operation.

1. Summary of Key Requirements

- a) The requirements in NAC 455C.506(9) regarding who may operate an elevator apply only to elevators under construction or alteration.
- b) While an elevator is under construction or alteration, the elevator may only be operated by an elevator mechanic, elevator mechanic apprentice, or elevator mechanic helper working under the direct supervision of an elevator mechanic.
- c) There are no operator requirements for existing elevators that are already installed and are not undergoing construction or alteration.
- d) Existing elevators used during construction require either a full operating permit or a limited operating permit.
- e) No elevator may be operated without a valid permit unless an exemption is granted under NRS 455C.110.

2. Applicability of NAC 455C.506(9)

NAC 455C.506(9) applies only to elevators that are under construction, installation, or alteration.

- a) When an elevator is being constructed, only a licensed elevator mechanic, an elevator mechanic apprentice or elevator mechanic helper working under the direct supervision of an elevator mechanic, may operate it.
- b) This restriction does not apply to existing elevators that are already installed and are not undergoing construction or alteration.

3. Distinction Between Elevator Construction and Elevator Use During Construction

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These scenarios involve different safety considerations and therefore fall under different regulatory frameworks.

- a) Elevator under construction – subject to NAC 455C.506 requirements, including operator restrictions.
- b) Existing elevator used during construction – subject to operating permit requirements under NRS 455C.100 and NAC 455C.510.

4. Permit Requirements Under NRS 455C.100

Under NRS 455C.100, no elevator may be operated without a valid permit, unless an exemption is granted pursuant to NRS 455C.110. Owners must obtain one of the following:

- a) Full Operating Permit (NAC 455C.510(1))
 - i) Issued when an elevator passes inspection and complies with NAC 455C.400–455C.528.
 - ii) Required for normal operation of existing elevators.
- b) Limited Operating Permit (NAC 455C.510(3))
 - i) Allows an elevator to be used during construction activities.
 - ii) Requires compliance with alternative safety measures.
 - iii) Does not require operation exclusively by a licensed elevator mechanic.

5. Use of Elevators for Personnel and Materials

When elevators are used to transport workers, materials, or both during construction, the owner must ensure that:

- a) A valid operating permit (full or limited) is in place.
- b) All applicable safety requirements are followed.
- c) The intended use aligns with the permit type issued.

Attachment

Code references in NRS 455C and NAC 455C

This memorandum is intended to serve as a standing reference for inquiries regarding elevator use during construction. For questions about specific installations, permit applications, or compliance requirements, stakeholders should contact the Mechanical Compliance Section directly.

Attachment

Code References in NRS 455C and NAC 455C

NRS 455C.100 Owner of boiler, elevator or pressure vessel to obtain permit from Division; exception.

The owner of a boiler, elevator or pressure vessel must obtain a permit issued by the Division before the boiler, elevator or pressure vessel may be operated unless the Division has provided an exemption for the boiler, elevator or pressure vessel pursuant to [NRS 455C.110](#).

NRS 455C.110 Regulations: Standards and procedures; certification of boiler inspectors and elevator mechanics; grounds for disciplinary action; methods of enforcement. The Division shall adopt regulations that establish:

1. Standards and procedures relating to the installation, inspection, operation, maintenance, relocation, improvement, alteration and repair of boilers, elevators and pressure vessels, including, without limitation, regulations:
 - (a) Providing an exemption from those standards and procedures:
 - (1) In the case of an emergency; or
 - (2) If the Division determines that it is in the best interests of the general public; and
 - (b) Establishing requirements for the inspection of boilers, elevators and pressure vessels.
 2. The requirements for the issuance and renewal of a certificate as:
 - (a) A boiler inspector; and
 - (b) An elevator mechanic.
 3. The grounds for initiating disciplinary action against a holder of a certificate, including, without limitation, the grounds for:
 - (a) The suspension or revocation of a certificate; and
 - (b) Requiring the holder of a certificate to pay an administrative fine.
 4. The methods of enforcement the Division will use to ensure compliance with [NRS 455C.100](#) and the regulations adopted pursuant to subsection 1, including, without limitation:
 - (a) Notifying an owner of a boiler, elevator or pressure vessel that the owner has violated a provision of the regulations adopted pursuant to subsection 1 and establishing a period within which the owner must correct the violation;
 - (b) Requiring the owner to pay an administrative fine; and
 - (c) Suspending or revoking a permit issued by the Division pursuant to [NRS 455C.100](#).
- (Added to NRS by [2001, 1049](#))

NAC 455C.506(9)

An elevator for which a limited operating permit to allow the elevator to be used during construction of the elevator has been issued pursuant to NAC 455C.510 may only be operated by:

- (a) An elevator mechanic; or
- (b) An elevator mechanic apprentice or elevator mechanic helper working under the direct supervision of an elevator mechanic.

NAC 455C.510 Operating permits: Requirements for issuance; location; limited permit; denial, suspension or revocation. ([NRS 455C.110](#))

1. The Mechanical Compliance Section shall issue an operating permit to the owner of an elevator within the period set forth in subsection 2 if the written report of inspection indicates the elevator is in compliance with NAC 455C.400 to 455C.528, inclusive. The operating permit must set forth the number assigned by the Mechanical Compliance Section and the serial number assigned by the manufacturer of the elevator. The operating permit must be retained on the premises where the elevator is installed. The owner shall post in each elevator information regarding the operating permit as required by the Mechanical Compliance Section.

2. The Mechanical Compliance Section shall issue an operating permit within:

- (a) Thirty calendar days for existing installations; and
- (b) Fifteen calendar days for new elevators,

➡ after the date of the inspection, unless the time is extended by the Mechanical Compliance Section. An elevator for which a permit is required must not be operated unless the operating permit has been issued.

3. The Mechanical Compliance Section may issue a limited operating permit to allow an elevator to be used during construction.

4. The Mechanical Compliance Section shall not issue an operating permit for a period that exceeds:

(a) One year for elevators, dumbwaiters, platform lifts and material lifts.

(b) Six months for escalators, moving walks or any personnel hoist which is permanently installed.

(c) Except as otherwise provided in paragraph (b), the period designated by the Mechanical Compliance Section for related equipment.

(d) Ninety calendar days if the operating permit is a limited operating permit issued to allow an elevator to be used during construction.

5. If the written report of an inspection of an elevator indicates a violation of NAC 455C.400 to 455C.528, inclusive, or of the detailed plans and specifications approved by the Mechanical Compliance Section pursuant to NAC 455C.506, the Mechanical Compliance Section shall give notice to the owner of the elevator and may give notice to any other appropriate person of the changes necessary for compliance. If the owner makes the changes required by the Mechanical Compliance Section, the Mechanical Compliance Section shall issue an operating permit to the owner within:

(a) Thirty calendar days for existing installations; and

(b) Fifteen calendar days for new elevators,

➡ after the date the changes were completed, unless the time is extended by the Mechanical Compliance Section.

6. If the written report of an inspection of an elevator indicates that the elevator is unsafe and that its continued operation may be dangerous, the Mechanical Compliance Section shall refuse to issue, or shall suspend or revoke, the operating permit and shall require the owner of the elevator to ensure that the elevator will not be used until the elevator has been made safe and is in compliance with the requirements of NAC 455C.400 to 455C.528, inclusive.