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Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

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Dear Sir:

I am writing to comment on two issues related to nuclear power plant safety which I understand are now being considered for rule changes.

First, I support the proposal to establish mandatory limits on employee working hours at nuclear power plants. I understand that the NRC long ago recommended guidelines that limit workers to 16 hours per day and 72 hours per week, but these guidelines did not apply to all personnel and in any case, applied only when the power plant is in operation. In the current competitive climate for energy production, I understand that economics make it tempting for power plant managers to hire as few workers as possible and work them extraordinarily long hours when necessary, especially when the power plant is off line because of maintenance, refueling or repairs. The guidelines should be made mandatory and should apply to all workers all of the time. We cannot afford to have fatigued workers set off another Three Mile Island or Chernobyl. I used minute quantities of gamma-emitting radioisotopes in biological experiments for many years and have a healthy respect for the havoc which could be caused in a nuclear power plant by a fatigued worker in any position. It is, if anything, even more important to have alert workers doing the maintenance, refueling or repairs than when the plant is up and running normally. The system is only as safe and effective as the weakest link – in the present context, the possibility of an error made by a fatigued worker. The power plant operators will tend to cut corners wherever they can within the law, especially in tight economic conditions. It is up to the NRC to establish clear and reasonable regulations to protect the workers from unreasonable work schedules, and to protect the public from a nuclear power plant disaster which could easily have been avoided by mandating reasonable work schedules.

I also support a related rule which I understand is being considered, one which would require nuclear power plant owners to train supervisors and managers in employee protection regulations. This would protect plant workers who conscientiously raise safety concerns from illegal harassment and intimidation by supervisors who can now claim "ignorance of the law." Again, it is important to encourage every worker who responsibly questions a condition or a practice which might adversely affect the safe operation of the plant to bring the issue to the attention of her/his supervisor or whoever is in a position to correct the problem without fear of reprisal.

Sincerely,
Elizabeth Wien
Elizabeth M. Wien, Ph.D.
Retired