(149)

DOCKET NUMBER
PETITION RULE PRM 26-2
(64FR67202)

6 February, 2000

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Gentleman,

This letter is to provide comments on your petition assigned Docket No. PRM-26-2 regarding nuclear power plant worker overtime and work hours. The current administrative guideline limit of 72 hours per week is adequate to prevent excessive fatigue in individuals working typical 12 hour shifts. This limit insures the individual will receive at least one day off per week.

A 60 hour per week limit for the Transportation industry (i.e. truck drivers, etc.) may be justified for them as they are often traveling on the nation's hi-ways and trying to rest or sleep in road side rest stops or unfamiliar motels, etc. which can often result in non-productive rest. Licensed Operators and nuclear power plant workers on the other hand are able to return home every day after their shift and sleep in a familiar and comfortable environment resulting in a much better productive rest period for them. This allows them to be able to work longer periods of time and not be any more fatigued than probably what a Transportation industry worker may be only working 60 hours a week.

Reducing the hours per week a nuclear industry worker can work will also simply require more **mandatory** overtime to be imposed on workers who traditionally don't want to work over time but will now have to since other workers willing to work the extra overtime will not be allowed to do so. Forcing mandatory overtime on individuals can lead to morale problems which can be of a much greater concern than potential operator fatigue. Perhaps the NRC should be more concerned with the issues of mandatory versus voluntary overtime assignments being made at Licensed facilities.

Sincerely,

Craig Smith

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