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# CITIZENS AWARENESS NETWORK

FEB 15 AM 11:51

DOCKET NUMBER

PETITION RULE PRM 26-2  
(64FR67202)

February 14, 2000

US NRC  
Secretary of the Commission  
Washington, DC 20555-0001

Re: CAN's comments on two proposed rules: 1) establishing limits on employee working hours at nuclear power reactors and 2) training supervisors, managers and directors on employee protection regulations

To Whom It May Concern:

By this letter, the Citizens Awareness Network (CAN) formally submits comments on the two proposed rules referenced above. CAN is a volunteer, grassroots organization with chapters in reactor communities in MA, CT, VT and NY. We have over 2,000 supporting members.

The Citizens Awareness Network agrees with the Union of Concerned Scientists in that it is time for the Federal government to impose enforceable working hour limits for employees at nuclear power stations. These limits, which are needed to prevent worker fatigue and performance problems, must be applicable whether the nuclear reactor is running, shutdown such as in a refueling or other maintenance outage or decommissioning. We request that your agency act as quickly as reasonable possible to establish employee working hour limits before utilities trim their workforces to dangerous levels in their haste to be competitive in a deregulated electricity market.

The Citizens Awareness Network also supports the Union of Concerned Scientist's proposed rule to mandate the training of supervisors, managers and directors on employee protection regulations. Employee protection regulations training will allow individuals to be held responsible should they break the law by harassing workers. Consider that key managers and supervisors at the Millstone nuclear complex who were responsible for systematically thwarting a safety conscious work environment for years, went unpunished and in some cases, continue to work at the Millstone complex. Regulation that allows the latter to occur defies logic, is ineffective and leaves workers disheartened and silenced. Accountability is the only way to bring an end to chilled workforces.

Nuclear reactor workers are our first lines of defense in the protection of our communities and the environment from nuclear mishaps and accidents. We request that you protect them by implementing both of the proposed rules referenced above.

Sincerely,

*Deb Katz* (RS)

Deb Katz  
Executive Director

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