

389 Belmont #111
Oakland CA 94610
510-835-2334

December 8, 1999
00 FEB 18 P3:09

Ch
A

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

Dear Sir:

The following are formal comments to the Nuclear Regulatory Commission supporting the proposed rule published in the Federal Register on October 27, 1999 regarding training for supervisors, managers, and directors related to employee protection regulations

DOCKET NUMBER
PETITION RULE PRM 30-62
(64FR57785)

NRC regulations supposedly protect nuclear workers from harassment and intimidation. When these regulations are violated, I gather that the NRC can take actions against both the worker's employer and also against the responsible individual, including banning them from the nuclear industry.

However, in practice after determining who has harassed and intimidated a nuclear worker for raising a safety concern, I gather that the NRC mostly limits its sanctions to the company alone, and in most cases takes no legal action against the individuals doing the illegal acts. By claiming to be ignorant of the employee protection regulations, nuclear power plant supervisors and managers have been able to fire workers who raise safety concerns. This serves to effectively silence all other workers.

A rule requiring supervisors, managers, and directors in the nuclear industry to be trained on employee protection regulations would eliminate this "ignorance of the law" excuse. It is simple and obvious.

When people are personally responsible, I suggest that we will see much less harassment and intimidation, and therefore safer nuclear power plants, which is to the benefit of everyone.

Thank you very much.
Sincerely,
Patricia H. Seffens
Patricia H. Seffens

DS10