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Rules and Directives  
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USNRC

Chief, Rules and Directives Branch  
Office of Administration, Ms-T6-D59  
U.S. Nuclear Regulatory Commission  
Attn; Rulemakings and Adjudications Staff  
Washington, DC 20555-0001

Subject: Utility Workers Union of America - Comments, Proposed  
"Best Practices to establish and Maintain a Safety Conscious Work  
Environment"

Reference: Best Practices to Establish and Maintain a Safety  
Conscious Work Environment (69 FR 7025, February 12, 2004)

Dear Sir or Madam:

The UWUA fully supports efforts to improve the industry's establishment of a Safety Conscious Work environment. The proposed issuance of a "Best Practice" can only help in the safeguarding of the public safety that the Commission and the UWUA are committed to.

Given that the Commission's role is that of a regulator, it is intrinsic, and inherent in the evolution of regulations, that good practices would be sought out, and provide the bases for new standards, and inspection checklists. We have only to consider the lessons learned from the airline industry, when considering the paradigm of deregulation with as many new challenges as opportunities. The industry has already embraced, and endorses the concept of benchmarking, and standardization despite the diverse cultural environments involved. They herald the efficiencies of scale realized through these efforts.

The industry funded groups, INPO and NEI, operate with an

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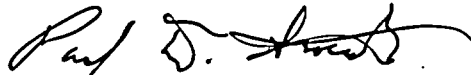
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assumption of Safety being everyone's first consideration, but Davis-Bess serves as testament to programmatic failures that can insinuate themselves into organizations as the result of multiple, and competing criteria. It is our opinion that providing this information to the NRC, and to individual inspectors, will allow them to be more efficient in the fulfillment of their responsibilities. It will provide the catalyst for more effective and timely improvement by nuclear operators.

Furthermore, the UWUA does believe in the NRC's role as the ultimate guardian of public safety.....the public holds that view as well, as learned from the events of Millstone Unit 1. We do not believe that the NRC should be subservient to any industry group's judgment as to the best interests of the public.

Sincerely, and respectfully,

A handwritten signature in cursive script, appearing to read "Paul D. Smith".

P.D.Smith, President  
UWUA - L590