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From: "Huszarik, Matthew" <MJH2@pge.com>
To: <drd@nrc.gov>
Date: Thu, Sep 2, 2004 12:49 PM
Subject: Proposed Rule for Fatigue of Workers at Nuclear Power Plants

Mr. Desaulniers

I have worked in the Commercial nuclear power industry for over twenty years. I have participated in numerous outages and worked long hours during all of them. While I agree with the principles and generally the specifics of the proposed new rules I do have a concern and some input. The 800 hour limit for a 13 week period seems a bit restrictive for both the Companies and employees who want to work the extra time. The limit I believe would eventually impact the ability of Companies to return their power plants to operation in a reasonable time frame. The input I would like to provide is the following. Worker's ability to work long hours varies greatly, I have seen some that get fatigued when asked to work even 50 hours per week, because of numerous different issues from health, general physical fitness, to outside commitments. I would propose that there be two sets of limits those that are for voluntary long hours and those that are for forced long hours with the later being considerably more restrictive. Also I would propose that wording be included to give Companies incentive to give people days off, working 12 hours a day five days a week is much less strenuous than working 8 hours a day seven days a week even though the former has more time spent at work. The same can be said of 10 hour days seven days a week versus 12 hour days six days a week. For the same amount of time worked it is much less fatiguing to work fewer days of more hours, up to about 12 to 14 per day, than more days of fewer hours because of less full days off.

Thank You For Taking My Input
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